**EXHIBIT 35** 

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                IN THE UNITED STATES DISTRICT COURT
 2
              FOR THE EASTERN DISTRICT OF PENNSYLVANIA
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    MONIQUE RUSSELL, JASMINE
    RIGGINS, ELSA M. POWELL, and
 6
    DESIRE EVANS,
                  Plaintiffs, Case No. 18-5629
 7
            v.
    EDUCATIONAL COMMISSION FOR
    FOREIGN MEDICAL GRADUATES,
 8
                  Defendants.
9
10
                         Washington, D.C.
11
                     Friday, September 12, 2019
12
               Deposition of JASMINE RIGGINS, a witness
13
     herein, called for examination by counsel for the
14
     Defendant in the above-entitled matter, pursuant
15
     to notice, the witness being duly sworn by Barbara
16
     DeVico, a Notary Public in and for the District of
17
     Columbia, taken at the offices of MORGAN, LEWIS &
18
     BOCKIUS, LLP, 1111 Pennsylvania Avenue,
     Washington, D.C., at 11:33 a.m.,
19
20
     Thursday, September 12, 2019, and the proceedings
21
     being taken down by Stenotype by BARBARA De VICO,
22
     CRR, RMR, and transcribed under her direction.
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Page 2	Page 4
<sup>1</sup> APPEARANCES:	1 PROCEEDINGS
<sup>2</sup> On Behalf of the Plaintiffs	THE VIDEOGRAPHER: This is the
<sup>3</sup> CORY L. ZAJDEL, ESQUIRE	start of the videotaped deposition of
<sup>4</sup> Z LAW, LLC	4 Jasmine Riggins in the matter of Monique
<sup>5</sup> 2345 York Road, #B-13	5 Russell et al. versus Educational
<sup>6</sup> Timonium, MD 21093	6 Commission for Foreign Medical Graduates
7	7 in the United States District Court for
<sup>8</sup> On behalf of the Defendant:	8 the Eastern District of Pennsylvania.
<sup>9</sup> BRIAN W. SHAFFER, ESQUIRE	9 This deposition is being held at
<sup>10</sup> MORGAN, LEWIS & BOCKIUS, LLP	Morgan Lewis, 1111 Pennsylvania Avenue, NW
1701 Market Street	about, Washington, D.C. on September 12,
Philadelphia, PA 19103-2921	2019, at approximately 11:34 a m.
brian.shaffer@morganlewis.com	My name is Nam Ngo from Golkow
14	Litigation Services, and I'm the legal
15	video specialist. The court reporter is
16	Barbara DeVico. Would counsel please
<sup>17</sup> Also Present: Nam Ngo, Videographer	17 introduce yourself.
18 18 18 18 18 18 18 18 18 18 18 18 18 1	18 (Attorneys stated their
19	appearances for the record.)
20	THE VIDEOGRAPHER: Would the court
21	reporter please swear in the witness.
22	22 ************
23	23
24	24
25	25
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1 TABLE OF CONTENTS	1 JASMINE RIGGINS,
1 TABLE OF CONTENTS 2 WITNESSES	<ul> <li>JASMINE RIGGINS,</li> <li>having been called as a witness on behalf of the</li> </ul>
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	Jasmine	K.	iggins
	Page 6		Page 8
1	Q. And was that earlier this year?	1	I'm just trying to make sure there's no confusion
2	A. Yes.	2	as to what you meant when you shake your head.
3	Q. Okay. Was that in connection with	3	Is that fair?
4	another lawsuit that you filed?	4	A. Yes.
5	A. Yes.	5	Q. We'll take a break at any point that
6	Q. And was that a lawsuit that was	6	you need to today as long as there's not a question
7	filed in Maryland against Dimensions Healthcare?	7	that's pending. This isn't an endurance contest.
8	A. Yes.	8	If you need to take a break for any reason, we'll
9	Q. And that's the only deposition	9	do that, okay?
10	you've ever given besides this one?	10	A. Okay.
11	A. Correct.	11	Q. There are some topics that we may
12	Q. Okay. A few ground rules just to	12	talk about today about your personal health that
13	remind you about how a deposition works.	13	may be sensitive or uncomfortable, and I apologize
14	The oath that you gave this morning is the	14	for that. I'm not trying to be intrusive. But
15	same one that you would give in a courtroom before	15	there are certain questions that I may need to ask,
16	a judge and a jury.	16	and I'm going to try to do that as best I can. If
17	Do you understand that?	17	you feel uncomfortable about that, will you let me
18	A. Yes.	18	know?
19	Q. And we're here to ask you some	19	A. Yes.
20	questions and get your best answer and	20	Q. Thank you.
21	understanding as to those questions.	21	Do you have any questions before we begin
22	Do you understand that?	22	
23	A. Yes.	23	A. No.
24	Q. If I ask a question and you don't	24	Q. What did you do to prepare, if
25	understand what I'm asking, will you tell me that?	25	anything, for coming in here today?
	Page 7		Page 9
1	A. Yes.	1	A. Just practiced, talked to my
2	Q. And I'll be happy to try to correct	2	attorneys.
	', TC1 .! 1 . T	1 2	0 01 0 11
3	it. That's what I want you to tell me.	3	Q. Okay. So you met with your
4	A. Okay.	4	attorney, Mr. Zajdel, who is here with us this
4 5	<ul><li>A. Okay.</li><li>Q. If you don't hear me, the court</li></ul>	4 5	attorney, Mr. Zajdel, who is here with us this morning?
4 5 6	A. Okay. Q. If you don't hear me, the court reporter can read the question back or I'll repeat	4 5 6	attorney, Mr. Zajdel, who is here with us this morning?  A. Yes.
4 5 6 7	A. Okay. Q. If you don't hear me, the court reporter can read the question back or I'll repeat the question for you. Is that fair?	4 5 6 7	attorney, Mr. Zajdel, who is here with us this morning?  A. Yes.  Q. How many times did you meet with him
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Okay. Q. If you don't hear me, the court reporter can read the question back or I'll repeat the question for you. Is that fair? A. Sure. Q. We're taking your testimony down both by the court reporter here that will come in a little booklet on a page as well as on a videotape. Do you understand that? A. Yes. Q. It's important that you speak as loudly and as clear as you can. We all have little microphones, but it will still be easier for everyone if you try to speak up. If somebody doesn't hear you, I may ask you to repeat yourself just so everyone can hear you. Is that okay? A. Yes.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	attorney, Mr. Zajdel, who is here with us this morning?  A. Yes. Q. How many times did you meet with him to prepare for the deposition? A. Just once. Q. When was that? A. No. Tuesday. I spoke with Cory, I'm sorry. Not Cory, David, my apologies. Q. Okay. A. I spoke with David on Tuesday. Q. Okay. And David is another one of your lawyers? A. Yes. Q. So you spoke with David by the telephone on Tuesday? A. Yes.
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Okay. Q. If you don't hear me, the court reporter can read the question back or I'll repeat the question for you. Is that fair? A. Sure. Q. We're taking your testimony down both by the court reporter here that will come in a little booklet on a page as well as on a videotape. Do you understand that? A. Yes. Q. It's important that you speak as loudly and as clear as you can. We all have little microphones, but it will still be easier for everyone if you try to speak up. If somebody doesn't hear you, I may ask you to repeat yourself just so everyone can hear you. Is that okay? A. Yes. Q. Same thing, even though on the videotape we might see a nod of the head or a shake of the head, the court reporter can't take that down as clearly, so I may ask you for an audible	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	attorney, Mr. Zajdel, who is here with us this morning?  A. Yes. Q. How many times did you meet with him to prepare for the deposition? A. Just once. Q. When was that? A. No. Tuesday. I spoke with Cory, I'm sorry. Not Cory, David, my apologies. Q. Okay. A. I spoke with David on Tuesday. Q. Okay. And David is another one of your lawyers? A. Yes. Q. So you spoke with David by the telephone on Tuesday? A. Yes. Q. Okay. For how long did you talk to David? A. Not long. A few minutes. Q. Less than 30 minutes?
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Okay. Q. If you don't hear me, the court reporter can read the question back or I'll repeat the question for you. Is that fair? A. Sure. Q. We're taking your testimony down both by the court reporter here that will come in a little booklet on a page as well as on a videotape. Do you understand that? A. Yes. Q. It's important that you speak as loudly and as clear as you can. We all have little microphones, but it will still be easier for everyone if you try to speak up. If somebody doesn't hear you, I may ask you to repeat yourself just so everyone can hear you. Is that okay? A. Yes. Q. Same thing, even though on the videotape we might see a nod of the head or a shake of the head, the court reporter can't take that	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	attorney, Mr. Zajdel, who is here with us this morning?  A. Yes. Q. How many times did you meet with him to prepare for the deposition? A. Just once. Q. When was that? A. No. Tuesday. I spoke with Cory, I'm sorry. Not Cory, David, my apologies. Q. Okay. A. I spoke with David on Tuesday. Q. Okay. And David is another one of your lawyers? A. Yes. Q. So you spoke with David by the telephone on Tuesday? A. Yes. Q. Okay. For how long did you talk to David? A. Not long. A few minutes.

Page 17 1 Q. Did you look at any documents while 2 you were talking to David? Did David show you any 3 documents? 4 MR. ZAIDEL: Objection. Don't 5 answer that. 6 Q. I'll rephrase. 7 Did you look at any documents in connection 8 with preparing for the deposition? 9 A. Yes. 10 Q. What documents did you look at? 11 A. My deposition documents. 12 Q. So your deposition transcript from 13 the Maryland Direntsoins cuse? 14 A. Yes. 15 Q. The transcript, the little booklet 16 that had questions and answers, is that what you're 17 referring to? 18 A. Yes. 19 Q. When did you review that? 20 Q. When did you do any online 21 perform own thin his lawsuit ever? 22 A. Not today. 23 A. Not today. 24 Q. Okay, Did you do any online 25 Internet research or review before coming in to estify today? 26 A. About a few weeks ago. It's been 27 a. About a few weeks ago. It's been 28 ongoing, different times. 29 Q. When was that? 30 Q. When was that? 41 A. Something like that, yes. 42 Q. Okay, So you were, for fack of a case and what was going on with him. Just 29 Last the Akodic anse, just about the case and what was going on with him. Just 20 D. Was that did your eview that? 21 A. Something like that, yes. 22 A. Something like that, yes. 23 A. Something like that, yes. 24 A. About, you know, the fraud, him the province of the prov		UasiiiIIe		
2 were they newspaper articles? 3 documents? 4 MR ZAIDEL: Objection. Don't 5 answer that. 5 Q. I'll rephrase. 7 Did you look at any documents in connection 8 with preparing for the deposition? 9 A. Yes. 10 Q. What documents did you look at? 11 A. My deposition documents. 12 Q. So your deposition transcript from 13 the Maryland Dimensions case? 14 A. Yes. 15 Q. The transcript, the little booklet 16 that had questions and answers, is that what you're 17 feeferring to? 18 A. Yes. 19 Q. What did you review that? 20 A. A few days ago. 21 Q. What dofter documents did you review that? 22 A. A few days ago. 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to testify today? 26 A. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 4 A. About a few weeks ago. It's been 6 ongoging, different times. 9 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit ever? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 12 A. Just the Akoda case, just about the 13 basically researching him preparity much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking 16 there word, Googling Dr. Akoda's name and looking 17 there. 10 A. Something like that, yes, 18 Q. You tell me what you did. I wasn't 19 there. 10 Q. Okay. 11 A. About, you know, the fraud, him 12 d. A. Was this a communication that the initiated or that you initiated? 13 A. Just about, you know, the fraud, him 14 A. Oy Okay. 15 A. Yes. 16 Q. Okay. 16 Q. Was this teepor or after you knew 21 were going to give a deposition in this case? 15 A. I't was before or after you knew 4 you were going to give a deposition in this case? 15 A. I't was before. 16 Q. And other than talking with your 21 works ago? 20 A. Not loday. 21 A. I to testify there today? 22 A. Not today. 23 A. Just than. 24 Q. Okay. So you were going the week ago of the weeks ago of the weeks ago of the weeks ago of the proper y	1	Page 10		Page 12
3 documents?   4	1	Q. Did you look at any documents while	1	Q. And what kind of things were they?
4 MR. ZAJDEL: Objection. Don't answer that. 5 answer that. 6 Q. I'll rephrase. 7 Did you look at any documents in connection 8 with preparing for the deposition? 8 with preparing for the deposition? 9 A. Yes. 10 Q. What documents did you look at? 11 A. My deposition documents. 12 Q. So your deposition transcript from 13 the Maryland Dimensions case? 14 A. Yes. 15 Q. The transcript, the little booklet 6 that had questions and answers, is that what you're 17 referring to? 18 A. Yes. 19 Q. When did you review that? 19 Q. When did you review that? 20 A. A few days ago. 21 Q. When did you review that? 22 A. A few days ago. 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to testify today? 25 A. Yes. 6 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 7 A. About a few weeks ago. It's been 8 ongoing, different times. 9 Q. What did you look at a few weeks ago online 10 connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching like that, yes. 18 Q. You tell me what you did. I wasn't there. 20 A. Well, basically I was just looking 2 the thing that was few posted 22 years ago. 20 Q. Okay. 21 Q. Okay. 22 A. Something like that, yes. 23 A. About, you know, the fraud, him 24 Q. Okay. Was this a communication that 22 the form of that a month of 24 communications with Ms. Russell? 25 A. Yes. 26 Q. You tell me what you did. I wasn't there. 27 A. I have communication was the last time you with first and pretty much. 28 A. A little more than a month or 25 less than a month? 29 C. What did you look at a few weeks ago. It's been 2 few the few that a few the few that a few the few the few that a few the few the few that a few that a few the few the few that a few the few that a few that a few the few that a few the few that a few that a few the few that a few that a few that a few the few that a f	2	you were talking to David? Did David show you any	2	Were they newspaper articles?
5 A. Yes. 19 Q. When dog years ago. 20 When dog years ago. 21 Q. What documents did you look at? 22 Q. So your deposition transcript from 23 the Maryland Dimensions case? 24 A. Yes. 25 Q. When did you review that? 26 Q. When did you review that? 27 referring to? 28 Q. When did you review that? 29 Q. What other documents did you review that? 20 Q. What other documents did you review that? 21 Q. What other documents did you review that? 22 Q. When did you review that? 23 A. I was before coming in to testify today? 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to 26 Internet research or review before coming in to 27 A. A Sout a few weeks ago. It's been a gonging, different times. 39 Q. When was that? 40 Q. When was that? 51 A. I don't recall. 51 weeks ago? 52 A. Uh-huh. 53 Q. Was that before or after you knew 64 Q. And other than talking with your 65 Q. And other than talking with your 65 Q. And other than talking with your 66 Q. And other than talking with your 67 counsel on Tuesday of this week, did you have any 68 Q. What other documents did you review 69 Internet research or review before coming in to 60 College of the weeks ago. 61 Q. What was goon on any Internet research 61 In connection with this lawsuit ever? 62 A. Yes. 63 Q. When was that? 64 A. Yes. 65 Q. When was the last time you spoke 65 A. Yes. 66 Q. When was that? 66 Q. And other than talking with your 67 counsel on Tuesday of this week, did you have any 68 additional counversations with anyone before coming 69 in to testify here today? 60 A. I weeks ago? 61 Internet research or review before coming in to 62 Q. What was the last time you spoke 63 A. Yes. 64 Q. Okay Did you do any online 65 A. Yes. 65 Q. When was the last time you spoke 66 Q. When was the last time you spoke 67 A. A Yes. 68 Q. And when was the last time you spoke 68 Q. And when was the last time you spoke 69 Q. What was going on with him. Just 60 Q. Did you ever text with Ms. Russell? 71 Q. Would it be more than a month. 72 Q. Did you ever text wi	3	documents?	3	A. No.
5 answer that. 6 Q. Till rephrase. 7 Did you look at any documents in connection 8 with preparing for the deposition? 9 Q. What documents did you look at? 11 A. My deposition documents. 12 Q. So your deposition transcript from 13 the Maryland Dimensions case? 14 A. Yes. 15 Q. The transcript, the little booklet 16 that had questions and answers, is that what you're 17 referring to? 19 Q. What did you review that? 19 Q. What did you review that? 10 Q. What doby a go. 21 Q. What other documents did you review 22 before coming in to testify today? 22 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to 26 Internet research or review before coming in to 27 A. About a few weeks ago. It's been 28 ongoing, different times. 39 Q. What didy ou look at a few weeks ago 10 online in connection with this lawsuit ever? 5 A. Yes. 6 Q. When was that? 7 A. About a few weeks ago. It's been 8 ongoing, different times. 9 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit ever? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a basically researching him pretty much. 15 better word, 16 Q. And to ther they that hose few weeks ago 17 online for information about him? 18 Q. You tell me what you did. I wasn't there. 19 A. Well, basically I was just looking 20 A. Well basically I was just looking 21 d. Ushuh. 22 d. When was the last time you were mail with Ms. Russell about Dr. Akoda? 23 A. Just about how I felt and how she 24 C. Okay. Was this a communication that 25 better word, 26 C. And you knew was the last time you goke 27 A. Not coday. 28 A. Just about how I felt and how she 29 C. What was going on with him. Just 20 C. Was that did you look at a few weeks ago. 29 C. Was that did you look at a few weeks ago. 20 Okay. So you were, for lack of a case in the past month or one control with this lawsuit? 29 C. Was that there they are the past mont	4	MR. ZAJDEL: Objection. Don't	4	Q. Were they court filings?
7 about what they were? 8 A. Just about him being fraudulent. I 9 A. Yes. 10 Q. What documents did you look at? 11 A. My deposition dranscript from 12 the Maryland Dimensions case? 13 the Maryland Dimensions case? 14 A. Yes. 15 Q. The transcript, the little booklet 16 that had questions and answers, is that what you're 16 that had questions and answers, is that what you're 17 referring to? 18 A. Yes. 19 Q. When did you review that? 20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to  Page 11 1 testify today? 2 A. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 4 A. About a few weeks ago. It's been 5 ongoing, different times. 9 Q. What didy ou look at a few weeks ago 10 online in connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking 16 online for information about him? 17 A. Well, basically I was just looking 21 at, just looking at the things that were posted 22 years ago. 24 A. About, you know, the fraud, him 25 Internet research or review before coming in to  27 A. About, you know, the fraud, him 28 C. Okay. Was this a communication that 22 she initiated or that you initiated? 29 C. What did you look at a few weeks ago 20 C. What did you look at a few weeks ago 30 online for information about him? 31 D. Would it be more than a month. 32 O. What did you look at a few weeks ago. 33 A. Just about how I felt and how she 34 O. Okay. Was this a communication that 22 she initiated or that you initiated? 24 O. Okay. Was this a communication that 23 she initiated or that you initiated? 25 O. A. About, you know, the fraud, him	5	answer that.	5	•
7 about what they were? 8 A. Just about him being fraudulent. I 9 A. Yes. 10 Q. What documents did you look at? 11 A. My deposition dranscript from 12 the Maryland Dimensions case? 13 the Maryland Dimensions case? 14 A. Yes. 15 Q. The transcript, the little booklet 16 that had questions and answers, is that what you're 16 that had questions and answers, is that what you're 17 referring to? 18 A. Yes. 19 Q. When did you review that? 20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to  Page 11 1 testify today? 2 A. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 4 A. About a few weeks ago. It's been 5 ongoing, different times. 9 Q. What didy ou look at a few weeks ago 10 online in connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking 16 online for information about him? 17 A. Well, basically I was just looking 21 at, just looking at the things that were posted 22 years ago. 24 A. About, you know, the fraud, him 25 Internet research or review before coming in to  27 A. About, you know, the fraud, him 28 C. Okay. Was this a communication that 22 she initiated or that you initiated? 29 C. What did you look at a few weeks ago 20 C. What did you look at a few weeks ago 30 online for information about him? 31 D. Would it be more than a month. 32 O. What did you look at a few weeks ago. 33 A. Just about how I felt and how she 34 O. Okay. Was this a communication that 22 she initiated or that you initiated? 24 O. Okay. Was this a communication that 23 she initiated or that you initiated? 25 O. A. About, you know, the fraud, him	6	O. I'll rephrase.	6	O. Were they what do you recall
8 with preparing for the deposition?   9 A. Yes.   9 don't really recall word for word.   10 Q. What documents did you look at?   11 Q. And you said you looked at those few   12 Q. So your deposition transcript from   12 A. Uh-huh.   13 Q. Was that before or after you knew   14 you were going to give a deposition in this case?   15 A. It was before.   16 Q. And other than talking with your   17 counsel on Tuesday of this week, did you have any   18 A. Yes.   18 additional conversations with anyone before coming   18 additional	7		7	
9 don't really recall word for word. 10 Q. What documents did you look at? 11 A. My deposition transcript from 12 the Maryland Dimensions case? 12 Q. So your deposition transcript from 13 the Maryland Dimensions case? 14 A. Yes. 15 Q. The transcript, the little booklet 16 that had questions and answers, is that what you're 17 referring to? 18 A. Yes. 19 Q. When did you review that? 20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 22 A. A just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to 26 Internet research or review before coming in to 27 A. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 4 A. About a few weeks ago. It's been 5 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So your deposition transcript from 15 case and what was going on with him. Just 16 that had questions and answers, is that what you did. I wasn't 19 there. 19 A. Week ago? 20 A. A Well, basically I was just looking 21 at, just looking at the things that were posted 22 years ago. 29 Cokay. 20 What was the last time you have well was offered times. 30 Q. Okay. 41 A. Well, basically I was just looking 42 A. About, you know, the fraud, him 42 Q. Okay. 43 A. About, you know, the fraud, him 44 Q. Okay. 45 A. About, you know, the fraud, him 46 Q. Okay. 47 A. About, you know, the fraud, him 49 were going to give a deposition in this case? 4 A. Uh-huh. 4 you were going to give a deposition in this case? 4 A. Uh-huh. 4 you were going to give a deposition in this case? 4 N. Uh-huh. 4 you were going to give a deposition in this case? 4 N. Uh that the fore or after you knew 4 you done to five the fitte bookle 4 It to testify today? 4 A. It was before. 4 It to testify here today? 5 A. It was before. 6 Q. When that the fore or after you knew	8			•
20 Q. What documents did you look at? 11 A. My deposition documents. 12 Q. So your deposition transcript from 13 the Maryland Dimensions case? 14 A. Yes. 15 Q. The transcript, the little booklet 16 that had questions and answers, is that what you're 17 referring to? 18 A. Yes. 19 Q. When did you review that? 20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 22 A. Just that. 23 Q. When was the last time you spoke 24 before coming in to testify today? 25 Internet research or review before coming in to  Page 11  1 testify today? 2 A. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 5 A. Yes. 6 Q. When was that? 7 A. About a few weeks ago. It's been 6 ongoing, different times. 9 Q. What didy ou look at a few weeks ago 10 online in connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking 16 online for information about him? 17 A. Something like that, yes. 18 Q. You tell me what you did. I wasn't 19 there. 19 Q. You tell me what you did. I wasn't 19 there. 20 A. Well, basically I was just looking 21 at, just looking at the things that were posted 22 years ago. 21 Q. Okay. 22 A. About, you know, the fraud, him 24 A. About, you know, the fraud, him 25 Determinent of the province of the				<u> </u>
11 weeks ago? 12 Q. So your deposition transcript from 13 the Maryland Dimensions case? 14 A. Yes. 15 Q. The transcript, the little booklet 16 that had questions and answers, is that what you're 17 referring to? 18 A. Yes. 19 Q. When did you review that? 20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to 26 Internet research or review before coming in to 27 a. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 4 A. About a few weeks ago. It's been 8 ongoing, different times. 9 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking to the case and what was going on with him. Just 18 decks ago? 19 Q. What did you look at a few weeks ago 10 online for information about him? 11 A. Something like that, yes. 12 Q. Okay. 13 Q. You tell me what you did. I wasn't 15 the case and what was going on with him. Just 16 Q. You tell me what you did. I wasn't 17 A. Something like that, yes. 18 Q. You tell me what you did. I wasn't 19 there. 20 A. About, you know, the fraud, him 21 A. Dust shouthow I felt and how she 22 years ago. 23 A. About, you know, the fraud, him 24 A. About is something that you have				
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16 that had questions and answers, is that what you're 17 referring to? 18 A. Yes. 19 Q. When did you review that? 20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to 26 Internet research or review before coming in to 27 A. Not today. 28 Q. When was that? 29 A. Not today. 20 Have you done any Internet research 4 in connection with this lawsuit ever? 4 A. About a few weeks ago. It's been 29 Q. What did you look at a few weeks ago 30 online in connection with this lawsuit? 31 A. Just the Akoda case, just about the 32 case and what was going on with him. Just 33 basically researching him pretty much. 44 Q. Okay. So you were, for lack of a online for information about him? 45 better word, Googling Dr. Akoda's name and looking of there. 46 Q. You tell me what you did. I wasn't of there. 47 A. Something like that, yes. 48 Q. You tell me what you did. I wasn't of there. 49 Q. Okay. 50 Q. Wash was that? 51 A. Well, basically I was just looking at the things that were posted of the property of the contained on the property of the communications with Ms. Russell about Dr. Akoda? 51 A. Well, basically I was just looking at the things that were posted of the property of the contained on the property of the contained of the pro				
17 referring to?  18 A. Yes. 19 Q. When did you review that? 20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to 26 Internet research or review before coming in to 27 A. Not today. 28 Q. When was the last time you spoke 29 A. Not today. 20 A. I've spoken to Monique Russell, but 21 I haven't spoken to her in the past month or so. 22 Q. When was the last time you spoke 23 with Ms. Russell? 24 A. I don't recall. It's been a little 25 while.  Page 11  1 testify today? 2 A. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 4 A. Yes. 6 Q. When was that? 7 A. About a few weeks ago. It's been 8 ongoing, different times. 9 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking 16 online for information about him? 17 A. Something like that, yes. 18 Q. You tell me what you did. I wasn't 19 there. 20 A. Well, basically I was just looking 21 at, just looking at the things that were posted 22 years ago. 23 Q. Okay. 24 A. About, you know, the fraud, him	15			
18 A. Yes.  19 Q. When did you review that?  20 A. A few days ago.  21 Q. What other documents did you review  22 before coming in to testify today?  23 A. Just that.  24 Q. Okay. Did you do any online  25 Internet research or review before coming in to  26 Internet research or review before coming in to  27 Page 11  1 testify today?  2 A. Not today.  3 Q. Have you done any Internet research  4 in connection with this lawsuit ever?  5 A. Yes.  6 Q. When was that?  7 A. About a few weeks ago. It's been  8 ongoing, differnt times.  9 Q. When was that?  10 Online in connection with this lawsuit?  11 A. Just the Akoda case, just about the  12 case and what was going on with him. Just  13 basically researching him pretty much.  14 Q. Okay. So you were, for lack of a online for information about him?  15 hetter word, Googling Dr. Akoda's name and looking of online for information about him?  16 online for information about him?  17 A. Something like that, yes.  18 Q. You tell me what you did. I wasn't of there.  20 A. Well, basically I was just looking at the things that were posted years ago.  21 Q. Okay.  22 Q. When was the last time you spoke  23 With Ms. Russell?  4 A. I don't recall. It's been a little  24 A. I don't recall. It's been a little  25 while.  26 Q. Would it be more than a month or  27 less than a month?  28 A. A little more than a month or  29 less than a month?  3 A. A little more than a month.  4 Q. Did you ever text with Ms. Russell?  5 A. No.  6 Q. Did you ever email with Ms. Russell?  7 A. I have.  8 Q. And when was the last time you of less than a month.  9 C. Man when was the last time you of less than a month.  10 A. The last time I spoke with her.  11 Q. So the last communication you had  12 with her, more than a month ago, was by email?  13 A. Yes.  14 Q. And what was the did your  15 better word, Googling Dr. Akoda's name and looking online for information about him?  16 A. Yes.  17 Q. What was the nature of your  18 Q. Okay. Was this a communication that  29 A. Well, basically I was j	16		16	
19 Q. When did you review that? 20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to  Page 11  1 testify today? 2 A. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 5 A. Yes. 6 Q. When was that? 7 A. About a few weeks ago. It's been 8 ongoing, different times. 9 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a online for information about him? 15 hetter word, Googling Dr. Akoda's name and looking on line for information about him? 16 online for information about him? 17 A. Something like that, yes. 28 Q. You tell me what you did. I wasn't benefits at just looking at the things that were posted years ago. 29 Q. Okay. 20 A. It ve spoken to Monique Russell, but 11 haven't spoken to her in the past month or so. 20 Q. When was the last time you spoke with Ms. Russell? 24 A. I don't recall. It's been a little 25 while.  Page 13  Page 13  Page 13  Page 13  A. A little more than a month or 2 less than a month? 3 A. A little more than a month Ms. Russell? 4 Q. Did you ever text with Ms. Russell? 5 A. No. 6 Q. Did you ever email with Ms. Russell? 7 A. I have. 8 Q. And when was the last time you emailed Ms. Russell? 9 A. The last time I spoke with her. 11 Q. So the last communication you had 22 with her, more than a month ago, was by email? 23 A. Yes. 24 Q. What was the nature of your 25 communications with Ms. Russell about Dr. Akoda? 26 pl. Q. Okay. Was this a communication that 27 pl. A. Yes. 28 Q. Okay. Was this a communication that 29 pl. A. Just about how I felt and how she 20 felt. 21 Q. Okay. Was this a communication that 22 she initiated or that you initiated? 23 Q. Okay. 24 A. A bout, you know, the fraud, him	17	referring to?	17	
20 A. A few days ago. 21 Q. What other documents did you review 22 before coming in to testify today? 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to 26	18	A. Yes.	18	additional conversations with anyone before coming
21  Q. What other documents did you review 22  before coming in to testify today? 23  A. Just that. 24  Q. Okay. Did you do any online 25  Internet research or review before coming in to 26  Page 11  1  testify today? 2  A. Not today. 3  Q. Have you done any Internet research 4  in connection with this lawsuit ever? 5  A. Yes. 6  Q. When was the last time you spoke 9  Q. Would it be more than a month or 1  less than a month? 9  Q. Did you ever text with Ms. Russell? 1  A. About a few weeks ago. It's been 10  online in connection with this lawsuit? 11  A. Just the Akoda case, just about the 12  case and what was going on with him. Just 13  basically researching him pretty much. 14  Q. Okay. So you were, for lack of a 15  better word, Googling Dr. Akoda's name and looking online for information about him? 16  A. Well, basically I was just looking 17  A. Well, basically I was just looking 18  Q. Okay. 20  Q. Wash. 31  A. Well, basically I was just looking 21  A. About, you know, the fraud, him 22  A. I don't recall. It's been a little 23  with Ms. Russell? 24  A. I don't recall. It's been a little 25  while.  Page 11  1  Q. Would it be more than a month or 2  less than a month? 3  A. A little more than a month. 4  Q. Did you ever text with Ms. Russell? 4  A. I have. 5  A. No. 6  Q. Did you ever email with Ms. Russell? 7  A. I have. 7  A. I have. 9  emailed Ms. Russell? 10  A. The last time I spoke with her. 11  Q. So the last communication you had 12  with her, more than a month ago, was by email? 13  A. Yes. 14  Q. And what was the did your 15  communications have anything to do with Dr. Akoda? 16  online for information about him? 17  A. Something like that, yes. 18  Q. You tell me what you did. I wasn't 19  there. 19  A. Just about how I felt and how she 10  felt. 21  Q. Okay. Was this a communication that 22  years ago.	19	Q. When did you review that?	19	in to testify here today?
22 before coming in to testify today? 23 A. Just that. 24 Q. Okay. Did you do any online 25 Internet research or review before coming in to  Page 11  1 testify today? 2 A. Not today. 3 Q. Have you done any Internet research 4 in connection with this lawsuit ever? 5 A. Yes. 6 Q. When was that? 7 A. About a few weeks ago. It's been 8 ongoing, different times. 9 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit? 11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking 16 online for information about him? 17 A. Something like that, yes. 18 Q. You tell me what you did. I wasn't 19 there. 20 A. Well, basically I was just looking 21 at, just looking at the things that were posted 22 years ago. 23 Q. Okay. 24 A. Alout has stime you spoke 24 M. I don't recall. It's been a little 25 while.  Page 13  Page 13  1 Q. Would it be more than a month or 2 less than a month? 3 A. A little more than a month. 4 Q. Did you ever email with Ms. Russell? 7 A. I have. 8 Q. Did you ever email with Ms. Russell? 7 A. I have. 8 Q. And when was the last time you 9 emailed Ms. Russell? 10 A. The last time I spoke with her. 11 Q. So the last communication you had 12 with her, more than a month ago, was by email? 13 A. Yes. 14 Q. And what was the did your 15 communications have anything to do with Dr. Akoda? 16 A. Yes. 17 Q. What was the nature of your 18 communications with Ms. Russell about Dr. Akoda? 19 there. 20 A. Well, basically I was just looking 21 at, just looking at the things that were posted 22 years ago. 23 Q. Okay. 24 A. About, you know, the fraud, him	20	A. A few days ago.	20	A. I've spoken to Monique Russell, but
A. Just that.  24 Q. Okay. Did you do any online 25 Internet research or review before coming in to  Page 11  1 testify today?  2 A. Not today.  3 Q. Have you done any Internet research 4 in connection with this lawsuit ever?  5 A. Yes.  6 Q. When was that?  7 A. About a few weeks ago. It's been 8 ongoing, different times. 9 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit?  11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking 16 online for information about him?  17 A. Something like that, yes.  18 Q. You tell me what you did. I wasn't 19 there.  20 A. Well, basically I was just looking 21 at, just looking at the things that were posted 22 years ago. 23 Q. Okay.  24 A. I don't recall. It's been a little 25 while.  Page 13  4. I don't recall. It's been a little 26 while.  Page 13  4. I don't recall. It's been a little 26 while.  Page 13  4. I don't recall. It's been a little 26 while.  Page 13  4. I don't recall. It's been a little 26 while.  Page 13  4. I don't recall. It's been a little 26 while.  Page 13  4. Q. Would it be more than a month or 2 less than a month?  A. A little more than a month.  4 Q. Did you ever text with Ms. Russell?  7 A. I have.  8 Q. And when was the last time you emailed Ms. Russell?  10 A. The last time I spoke with her.  11 Q. So the last communication you had  22 with her, more than a month ago, was by email?  13 A. Yes.  14 Q. And what was the did your  15 communications have anything to do with Dr. Akoda?  16 A. Yes.  17 Q. What was the nature of your  28 communications with Ms. Russell about Dr. Akoda?  29 felt.  21 Q. Okay. Was this a communication that  22 she initiated or that you initiated?  23 A. I initiated it.  24 Q. And this is something that you have	21	Q. What other documents did you review	21	I haven't spoken to her in the past month or so.
24 Q. Okay. Did you do any online 25 Internet research or review before coming in to  Page 11  Page 11  1 testify today?  A. Not today.  3 Q. Have you done any Internet research 4 in connection with this lawsuit ever?  5 A. Yes.  6 Q. When was that?  7 A. About a few weeks ago. It's been 8 ongoing, different times.  9 Q. What did you look at a few weeks ago 10 online in connection with this lawsuit?  11 A. Just the Akoda case, just about the 12 case and what was going on with him. Just 13 basically researching him pretty much. 14 Q. Okay. So you were, for lack of a 15 better word, Googling Dr. Akoda's name and looking online for information about him?  16 online for information about him?  17 A. Something like that, yes.  18 Q. You tell me what you did. I wasn't online for information about him?  19 there.  20 A. Well, basically I was just looking at the things that were posted 2 years ago.  23 Q. Okay.  4 A. Alout the froud, him  Page 11  Page 13  A. I don't recall. It's been a little while.  While.  Page 13  A. I don't recall. It's been a little while.  Page 13  A. I don't recall. It's been a little while.  Page 13  A. I don't recall. It's been a little while.  Page 13  A. I don't recall. It's been a little while.	22	before coming in to testify today?	22	Q. When was the last time you spoke
Page 11  1 testify today?  2 A. Not today.  3 Q. Have you done any Internet research 4 in connection with this lawsuit ever?  5 A. Yes.  6 Q. When was that?  7 A. About a few weeks ago. It's been  8 ongoing, different times.  9 Q. What did you look at a few weeks ago  10 online in connection with this lawsuit?  11 A. Just the Akoda case, just about the  12 case and what was going on with him. Just  13 basically researching him pretty much.  14 Q. Okay. So you were, for lack of a  15 better word, Googling Dr. Akoda's name and looking  16 online for information about him?  17 A. Something like that, yes.  18 Q. You tell me what you did. I wasn't  19 there.  20 A. Well, basically I was just looking  21 at, just looking at the things that were posted  22 years ago.  23 Q. Okay.  4 Q. Okay.  4 Q. Okay.  4 Q. Okay.  5 while.  Page 13  1 Q. Would it be more than a month or  2 less than a month?  3 A. A little more than a month.  4 Q. Did you ever text with Ms. Russell?  7 A. I have.  8 Q. And when was the last time you  9 emailed Ms. Russell?  10 A. The last time I spoke with her.  11 Q. So the last communication you had  with her, more than a month ago, was by email?  12 with her, more than a month ago, was by email?  13 A. Yes.  14 Q. And what was the did your  15 communications have anything to do with Dr. Akoda?  16 A. Yes.  17 Q. What was the nature of your  18 communications with Ms. Russell about Dr. Akoda?  19 felt.  20 Okay. Was this a communication that  22 she initiated or that you initiated?  23 A. I initiated it.  24 Q. And this is something that you have	23	A. Just that.	23	with Ms. Russell?
Page 11  1 testify today?  2 A. Not today.  3 Q. Have you done any Internet research 4 in connection with this lawsuit ever?  5 A. Yes.  6 Q. When was that?  7 A. About a few weeks ago. It's been  8 ongoing, different times.  9 Q. What did you look at a few weeks ago  10 online in connection with this lawsuit?  11 A. Just the Akoda case, just about the  12 case and what was going on with him. Just  13 basically researching him pretty much.  14 Q. Okay. So you were, for lack of a  15 better word, Googling Dr. Akoda's name and looking  16 online for information about him?  17 A. Something like that, yes.  18 Q. You tell me what you did. I wasn't  19 there.  20 A. Well, basically I was just looking  21 at, just looking at the things that were posted  22 years ago.  23 Q. Okay.  4 Q. Okay.  4 Q. Okay.  4 Q. Okay.  5 while.  Page 13  1 Q. Would it be more than a month or  2 less than a month?  3 A. A little more than a month.  4 Q. Did you ever text with Ms. Russell?  7 A. I have.  8 Q. And when was the last time you  9 emailed Ms. Russell?  10 A. The last time I spoke with her.  11 Q. So the last communication you had  with her, more than a month ago, was by email?  12 with her, more than a month ago, was by email?  13 A. Yes.  14 Q. And what was the did your  15 communications have anything to do with Dr. Akoda?  16 A. Yes.  17 Q. What was the nature of your  18 communications with Ms. Russell about Dr. Akoda?  19 felt.  20 Okay. Was this a communication that  22 she initiated or that you initiated?  23 A. I initiated it.  24 Q. And this is something that you have	24	Q. Okay. Did you do any online	24	A. I don't recall. It's been a little
Page 11  1 testify today?  2 A. Not today.  3 Q. Have you done any Internet research  4 in connection with this lawsuit ever?  5 A. Yes.  6 Q. When was that?  7 A. About a few weeks ago. It's been  8 ongoing, different times.  9 Q. What did you look at a few weeks ago  10 online in connection with this lawsuit?  11 A. Just the Akoda case, just about the  12 case and what was going on with him. Just  13 basically researching him pretty much.  14 Q. Okay. So you were, for lack of a  15 better word, Googling Dr. Akoda's name and looking  16 online for information about him?  17 A. Something like that, yes.  18 Q. You tell me what you did. I wasn't  19 there.  20 A. Well, basically I was just looking  21 at, just looking at the things that were posted  22 years ago.  23 Q. Okay.  4 Q. Would it be more than a month or  2 less than a month?  3 A. A little more than a month.  4 Q. Did you ever email with Ms. Russell?  7 A. I have.  8 Q. And when was the last time you  9 emailed Ms. Russell?  10 A. The last time I spoke with her.  11 Q. So the last communication you had  12 with her, more than a month ago, was by email?  13 A. Yes.  14 Q. And what was the did your  15 communications have anything to do with Dr. Akoda?  16 A. Yes.  17 Q. What was the nature of your  18 communications with Ms. Russell about Dr. Akoda?  19 there.  10 A. Well, basically I was just looking  21 at, just looking at the things that were posted  22 years ago.  23 Q. Okay.  24 A. About, you know, the fraud, him	25	Internet research or review before coming in to	25	while.
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	Page 14		Page 16
1	A. I should.	1	access at this moment, no.
2	Q. Did you communicate with her through	2	Q. But that's something you can get?
3	like a Facebook direct message, or this was direct	3	A. Yes. It's a process you have to go
4	message?	4	through.
5	A. Just like a Facebook message.	5	Q. At any point in time were you asked
6	Q. And this was a Facebook message in	6	to provide lawyers for ECFMG with any documents you
7	the last month or so, a little more than a month	7	have related to Dr. Akoda or the lawsuit or your
8	ago?	8	feelings about Dr. Akoda, anything like that?
9	A. Yes.	9	MR. ZAJDEL: Objection. Form.
10	Q. Okay. And have you spoken with	10	You can answer.
11	Ms. Russell or communicated with Ms. Russell at any	11	A. So what is your question?
12		12	Q. At any point in time after having
13	A. No.	13	
14		١	aware of a request by lawyers for ECFMG for any
	Q. Have you spoken with Ms. Russell	14	
15	about your lawsuit against ECFMG?	15	documents that you might have related to Dr. Akoda?
16	A. I don't recall.	16	MR. ZAJDEL: Objection. That's
17	Q. Did you speak with Ms. Russell about	17	attorney-client privilege.
18	your lawsuit against Dimensions Healthcare in	18	MR. SHAFFER: I'm not asking for
19	Maryland?	19	the substance of the communication. I'm
20	A. Yes.	20	asking if she was aware.
21	Q. And what did you and Ms. Russell	21	MR. ZAJDEL: I would suggest that
22	discuss about the lawsuit against Dimensions	22	you ask it differently.
23	Healthcare in Maryland?	23	BY MR. SHAFFER:
24	A. We just talked about the lawsuit.	24	Q. Did you ever collect Facebook direct
25	We didn't really I don't recall the full details	25	messages, email communications, text messages that
	7. 45	-	D 45
	Page 15		Page 17
1	of our conversation. She was asking me about how I		you might have in your possession related to
1	of our conversation. She was asking me about how I felt about it. Just basically about our feelings.		you might have in your possession related to Dr. Akoda and give them to anybody?
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2 3 4 5	of our conversation. She was asking me about how I felt about it. Just basically about our feelings.  Q. And this was by email again, or was this a phone call?	3 4	you might have in your possession related to Dr. Akoda and give them to anybody?  A. No. Did I ever collect it and give it to anyone?
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	Jasmine	1		
	Page 18		Page	20
1	which have not been produced.	1	as Jasmine Riggins, correct?	
2	MR. ZAJDEL: I would suggest that	2	A. Yes.	
3	you do that in writing so that we can	3	Q. Is your birthday July 4, 1992?	
4	respond in writing.	4	A. Yes.	
5	BY MR. SHAFFER:	5	Q. And how old would that make you?	
6	Q. Ms. Riggins, in preparing for the	6	5 A. 27.	
7	deposition today, you said you reviewed your	7	Q. Are you currently married?	
8	deposition transcript from your deposition earlier	8	A. No.	
9	this year in the Dimensions Healthcare case;	9	Q. Do you have any children?	
10	correct?	10	A. Yes.	
11	A. Right.	11	Q. How many children?	
12	Q. In reviewing that deposition	12	•	
13	transcript, did you identify any answers that you	13	Q. And can you give me their names and	d
14	gave that you now believe are wrong?	14		
15	A. I'm not sure. Can you ask me that	15	2	
16	again.	16	•	
17	Q. In reviewing the transcript, you	17		?
18	were under oath like you are today; right?	18	•	
19	A. Uh-huh.	19		
20	Q. You've now had a chance to review	20	· · ·	
21	that transcript before coming in to testify today.	21		
22	And my question is whether when you read through	22	• •	d
23	the transcript this week you said Oh, boy, I made a	23	-	
	mistake. What I testified to wasn't correct in my		has it changed?	OI
	deposition in the Dimension case.	25	•	
	deposition in the Dimension case.		A. It's the same.	
	D 10		D	
	Page 19		Page	21
1	A. No.	1	Q. What's your current address?	
2	<ul><li>A. No.</li><li>Q. And part of this is to try to save</li></ul>	1 2	Q. What's your current address? A. 3699 J Street, Apartment 301, N.E.	
2 3	A. No. Q. And part of this is to try to save time today. So I guess my question having read the		Q. What's your current address? A. 3699 J Street, Apartment 301, N.E.	
2 3 4	A. No. Q. And part of this is to try to save time today. So I guess my question having read the deposition just a few days ago, as you sit here	2	Q. What's your current address? A. 3699 J Street, Apartment 301, N.E. Washington, D.C. 20019.	
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Page 22 Page 24 1 Q. Prior to working at Potbelly <sup>1</sup> I went from one to the next. <sup>2</sup> starting earlier this year, had you worked -- had Again, just to make sure that I'm <sup>3</sup> you worked anywhere else in 2019, or was there a <sup>3</sup> not missing anything, before coming in to testify period of time when you weren't working? <sup>4</sup> today, you didn't review the complaint that was 5 I was working at the Home Depot. filed against ECFMG in the federal court or the 6 And how long -- did you leave court in Pennsylvania; correct? directly from Home Depot and go to Potbelly, or was A. You said I didn't. there a break? O. You didn't review that? 9 A. There was about a month break, a A. Not that I can recall. I'm sorry. 10 10 I can't recall. month or so. 11 Q. And again for purposes of trying to 11 O. Okay. As you sit here today, you 12 speed this up, in the Maryland Dimensions don't have a recollection of looking at the 13 Healthcare litigation you gave some written complaint that you filed against ECFMG? response to questions. 14 Oh, yes. I'm sorry. I'm sorry. 15 Do you recall having done that? We call <sup>15</sup> I'm sorry. I didn't understand what you were 16 them interrogatories. asking me. 17 Yes. 17 Α. Q. That's all right. 18 18 And one of the interrogatories you A. I did receive that -- did I get that Q. 19 were asked in that case was to list your prior in the email? I believe so. I'm sorry. 20 employment. And you indicated in that case that That's okay. When you say you think 21 you had started working at Home Depot in March of vou may have received it in an email, who was the 22 2017. Does that sound correct? email from? 23 23 Yes. Α. I'm sure I've seen it. I'm sure O. And so you worked at Home Depot from I've seen it. Yeah, I'm sure I've seen it. 25 March of 2017 to about February or March of 2019? Do you know when it was filed, Page 23 Page 25 1 approximately? 1 A. Yes. I don't recall. Q. And then you started at Potbelly in 3 April of 2019 and are still working there through Do you know whether it was filed in 2019? Since January or earlier than that. 4 today? 5 A. 5 I'm sorry, I don't recall. Yes. Great. Prior to working at Home Okay. That's okay. Again, I'm just <sup>7</sup> Depot starting in March of 2017, was there a period asking for your best understanding and recollection 8 of time before that that you were not working? as you sit here today without guessing. <sup>9</sup> Immediately before, I'm looking at the beginning But I take it that since you can't remember part of 2017. 10 when you might have seen it but you think you did 11 A. No. No. that you didn't review it specifically to come in here today. Is that correct? 12 O. Where were you working when you 13 went, before you went to Home Depot? A. That's correct. 14 A. At Paul Bakery. O. And I take it from your earlier 15 Got it. And how long did you work answers, but I just want to make sure, that when Q. you said a couple of weeks ago you went online 16 there, approximately? 17 looking at Dr. Akoda information, you didn't go to About almost two years. A. 18 the ECFMG website, for example; correct? And would it be correct then to say that you worked at Paul Bakery from about March of 19 A. Correct. 2015 to March of 2017? 20 20 Q. Have you ever gone to the ECFMG 21 Yes. 21 website? A. 22 Was there a period of time between 22 O. Α. No. And you've not ever reviewed any of 23 Paul Bakery and Home Depot when you weren't Q.

25

<sup>24</sup> working, or did you go right from one to the next?

Yes, that's exactly what happened.

the information that is on the ECFMG website,

correct?

	Jasmine	1/	-99-112
	Page 26		Page 28
1	A. No.	1	A. Questions, interviews, background
2	Q. When was the first time you ever	2	
3	heard of ECFMG?	3	Q. Okay. And your understanding is
4	A. From my attorneys.	4	
5	Q. Okay. And approximately when was	5	
6		6	and practice medicine in the United States?
7	A. I don't recall.	7	A. Yes.
8	Q. Is it fair to say that at no point	8	Q. And what's the basis for that
9	prior to having spoken with the attorneys that	9	understanding?
10		10	MR. ZAJDEL: Objection. You can
11		11	answer.
12	A. Repeat that again.	12	MR. SHAFFER: I'll rephrase the
13	Q. Sure. Prior to speaking with your	13	question.
14		14	
15	against ECFMG, you had never even heard of ECFMG?	15	Q. Other than from information told to
16	A. That is correct.	16	you by your lawyers, do you have any other source
17	Q. Okay. As you sit here today, what	17	
18	do you know about ECFMG?	18	
19	A. I know that they're a business who	19	who can't apply, what types of things ECFMG
20		20	requires?
21	permission to practice medicine in the United	21	Do you have any source of information about
22	States.	22	
23	Q. Do you know whether or not ECFMG is	23	A. No.
24	a nonprofit organization?	24	Q. I'm sorry?
25	A. I do not.	25	A. No.
	Page 27		Daga 20
- 1			Page 29
1	_	1	Page 29  O Okay We asked a couple of
1 2	Q. Do you know whether people who apply	1 2	Q. Okay. We asked a couple of
1 2 3	Q. Do you know whether people who apply to ECFMG could be U.S. citizens or not?	2	Q. Okay. We asked a couple of questions earlier that referenced, and I think your
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2 3 4 5	<ul> <li>Q. Do you know whether people who apply to ECFMG could be U.S. citizens or not?</li> <li>A. I do not.</li> <li>Q. You don't know?</li> <li>A. You said no, because it's for</li> </ul>	2	Q. Okay. We asked a couple of questions earlier that referenced, and I think your answer might have been the first to reference a Dr. Akoda.  Do you recall mentioning Dr. Akoda?
2 3 4 5	<ul> <li>Q. Do you know whether people who apply to ECFMG could be U.S. citizens or not?</li> <li>A. I do not.</li> <li>Q. You don't know?</li> <li>A. You said no, because it's for foreigners; correct?</li> </ul>	2 3 4 5	Q. Okay. We asked a couple of questions earlier that referenced, and I think your answer might have been the first to reference a Dr. Akoda.  Do you recall mentioning Dr. Akoda?  A. Not a Dr. Akoda, no.
2 3 4 5 6	<ul> <li>Q. Do you know whether people who apply to ECFMG could be U.S. citizens or not?</li> <li>A. I do not.</li> <li>Q. You don't know?</li> <li>A. You said no, because it's for foreigners; correct?</li> <li>Q. I'm trying to get your</li> </ul>	2 3 4 5 6	Q. Okay. We asked a couple of questions earlier that referenced, and I think your answer might have been the first to reference a Dr. Akoda.  Do you recall mentioning Dr. Akoda?  A. Not a Dr. Akoda, no.  Q. You understand that there is an
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25

Q. Okay.

25

off the record. The time is 11:53 a.m.

Page 30 Page 32 1 (Recess) <sup>1</sup> fact that he had fake credentials. 2 THE VIDEOGRAPHER: We are back on Okay. And the fact that he pled 3 the record. The time is 11:57 a.m. guilty, he didn't plead guilty to not going to 4 medical school; correct? <sup>4</sup> BY MR. SHAFFER: A. 5 Q. Okay, Ms. Riggins, we're back on the Correct. 6 record, and we were talking before a quick break And do you know whether or not there about an individual named Dr. Akoda, an Dr. Akoda's medical school in Nigeria ever verified 8 individual, and I think you took some issue with the authenticity of his diploma to Educational calling him Dr. Akoda. Why is that? Commission? 10 10 A. He's not a doctor. MR. ZAJDEL: Objection. Assumes 11 Q. And why do you say that? 11 facts. You can answer that question. 12 Because he doesn't have credentials 12 A. Do you know whether or not? O. 13 <sup>13</sup> and certifications to be a doctor. A. No. 14 14 Do you know -- and just so again I O. Would it surprise you to learn that a medical school in Nigeria verified Dr. Akoda's <sup>15</sup> want to make sure that we're talking about the same 16 things today so we don't have to go back later on, diploma to ECFMG? <sup>17</sup> when we refer to an individual known as Dr. Akoda 17 MR. ZAJDEL: Objection. Assumes 18 18 or the person that you believe is not a doctor facts. 19 19 about, we're talking about the person that you saw Q. You can go ahead and answer. <sup>20</sup> in connection with the birth of your second child; 20 Okay. You said would it surprise A. 21 correct? 21 me? 22 22 A. Correct. Q. Yes. 23 23 O. And, at the time that you were being Yes. Α. seen by him and actually gave birth with him 24 Q. Why is that? through C-section, correct? 25 Because it would be a surprise to me Page 31 Page 33 1 that he had information provided that he's a real 1 A. <sup>2</sup> doctor or went to medical school. O. You understood and knew him to be <sup>3</sup> Dr. Akoda? Correct? I'm sorry. During the time that you were being <sup>4</sup> treated by Dr. Akoda, you never had any reason to A. Correct. <sup>5</sup> question whether or not he had gone to medical And since that time you've come to O. <sup>6</sup> learn that Dr. Akoda pled guilty to using a 6 school; correct? different Social Security number, correct? Α. When I was being seen by him? No. 8 I wouldn't -- had I have known I wouldn't have A. Correct. 9 Okay. And so based on that chosen him. information, it's your belief that the person that Q. And there was nothing about his care you knew as Dr. Akoda is not a doctor? 11 and treatment of you in connection with your 12 12 pregnancy and the birth of Messiah that ever caused A. Correct. 13 you to doubt that he had gone to medical school and Okay. Do you know whether that O. individual went to medical school? was a real medical doctor, correct? 15 15 A. You said during my treatment with No. no. A. 16 16 him, no. O. He did not go to medical school? 17 17 When was it that you first received A. 18 any information that caused you to question whether How do you know that? O. 19 the person you had seen, Dr. Akoda, was not a real I'm saying no, I don't. A. doctor, as you say? 20 You don't know whether he went? O. 21 21 A. You said when was --A. 22 22 When did you first, first come to O. As you sit here today, do you have <sup>23</sup> any information or facts that would allow you to 23 have any information where you said everything say he didn't go to medical school? 24 seemed fine while I was being treated with him but 25 25 now there's a problem? When was that? The fact that he pled guilty and the A.

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	Page 34		Page 36
1	A. Well, there were problems after my	1	correct?
2	pregnancy, after the delivery, I had issues.	2	A. Correct.
3	Q. What were those issues?	3	Q. And I take it that that's because
4	A. Pain, severe pain in my stomach and	4	immediately following the C-section you were told
5	my abdominal at work, I would have pain throughout	5	you could have a tubal ligation?
6	the day. And I couldn't have my tubes tied due to	6	A. No. Correct, correct, I'm sorry.
7	the damaged tissues on my C-section, which caused a	7	Q. Okay. But then after the second,
8	lot of pain.	8	the birth of your second child and the second
9	Q. And so this is after the birth of	9	C-section, you were told you couldn't have one?
10	Messiah, and Messiah was born by C-section;	10	A. After the third.
11	correct?	11	Q. After the third?
12	A. Correct.	12	A. Correct.
13	Q. And you said at a later point in	13	
		١	•
14	time you wanted to have a tubal ligation and were	14	that there was significant scarring from your other
15	told you couldn't have one?	15	C-section; correct?
16	A. Correct.		A. Correct.
17	Q. And you were told it was because of	17	Q. If Dr. Akoda had seen significant
18	scarring that was present from earlier C-sections?	18	scarring at the time that he did the second
19	A. Correct.	19	C-section, that would suggest that that scarring
20	Q. And was that scarring that you say	20	came from the first C-section; right?
21	precluded you from having the tubal ligation, that	21	A. Correct.
22	was something you attribute to the C-section	22	Q. Because scarring doesn't happen
23	Dr. Akoda did?	23	overnight. It takes time to develop. Correct?
24	A. Correct.	24	A. Correct.
25	Q. And why do why do you do that?	25	(Exhibit 1, medical records,
	Page 35		Page 37
1	Page 35	1	Page 37
1 2	A. Because it was able to be done	1 2	was marked for identification.)
2	A. Because it was able to be done before, but I decided against it.	2	was marked for identification.) Q. Ms. Riggins, we're handing you
2 3	A. Because it was able to be done before, but I decided against it.  Q. When was it able to be done before?	2 3	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll
3 4	<ul><li>A. Because it was able to be done</li><li>before, but I decided against it.</li><li>Q. When was it able to be done before?</li><li>A. With my first son.</li></ul>	2 3 4	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll represent to you is medical records that relate to
2 3 4 5	<ul> <li>A. Because it was able to be done</li> <li>before, but I decided against it.</li> <li>Q. When was it able to be done before?</li> <li>A. With my first son.</li> <li>Q. Do you know whether or not and</li> </ul>	2 3 4 5	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll represent to you is medical records that relate to your treatment at Prince George Hospital Center in
2 3 4 5 6	A. Because it was able to be done before, but I decided against it.  Q. When was it able to be done before?  A. With my first son.  Q. Do you know whether or not and your first son, Santana; correct?	2 3 4 5 6	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll represent to you is medical records that relate to your treatment at Prince George Hospital Center in 2013.
2 3 4 5 6 7	A. Because it was able to be done before, but I decided against it.  Q. When was it able to be done before?  A. With my first son.  Q. Do you know whether or not and your first son, Santana; correct?  A. Correct.	2 3 4 5 6 7	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll represent to you is medical records that relate to your treatment at Prince George Hospital Center in 2013. Could you take a quick look at that, and
2 3 4 5 6 7 8	A. Because it was able to be done before, but I decided against it.  Q. When was it able to be done before? A. With my first son. Q. Do you know whether or not and your first son, Santana; correct? A. Correct. Q. Was born by C-section, correct?	2 3 4 5 6 7 8	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll represent to you is medical records that relate to your treatment at Prince George Hospital Center in 2013. Could you take a quick look at that, and then I'll have some quick questions.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Because it was able to be done before, but I decided against it.  Q. When was it able to be done before? A. With my first son. Q. Do you know whether or not and your first son, Santana; correct? A. Correct. Q. Was born by C-section, correct? A. Correct. Q. And who was the doctor that you saw for Santana? A. I don't recall her name. Q. Was it at Howard University? A. Correct. Q. And do you know whether or not there was any scarring that was later identified from the C-section that you received at Howard University? A. No, there was not. There wasn't any. Q. If there had been some, do you think that's the kind of thing that would be shown in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll represent to you is medical records that relate to your treatment at Prince George Hospital Center in 2013.  Could you take a quick look at that, and then I'll have some quick questions.  A. (Witness complies with request.) Q. Just let me know when you're ready. MR. ZAJDEL: Put it on the record that we reserve the right to make everything confidential after the deposition. Q. I'm not going to ask you about every word, but let me focus on a couple of things here. So Riggins-1 is a document Bates labeled Plaintiff's -2024 and -2025, which again I'll represent to you was produced to us in this case, and it appears to be an operative report for you, Jasmine Riggins. And it references a date of a
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Because it was able to be done before, but I decided against it.  Q. When was it able to be done before?  A. With my first son.  Q. Do you know whether or not and your first son, Santana; correct?  A. Correct.  Q. Was born by C-section, correct?  A. Correct.  Q. And who was the doctor that you saw for Santana?  A. I don't recall her name.  Q. Was it at Howard University?  A. Correct.  Q. And do you know whether or not there was any scarring that was later identified from the C-section that you received at Howard University?  A. No, there was not. There wasn't any.  Q. If there had been some, do you think that's the kind of thing that would be shown in medical records of you that would have come later?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll represent to you is medical records that relate to your treatment at Prince George Hospital Center in 2013.  Could you take a quick look at that, and then I'll have some quick questions.  A. (Witness complies with request.) Q. Just let me know when you're ready. MR. ZAJDEL: Put it on the record that we reserve the right to make everything confidential after the deposition. Q. I'm not going to ask you about every word, but let me focus on a couple of things here. So Riggins-1 is a document Bates labeled Plaintiff's -2024 and -2025, which again I'll represent to you was produced to us in this case, and it appears to be an operative report for you, Jasmine Riggins. And it references a date of a procedure on 3/18/2013.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Because it was able to be done before, but I decided against it.  Q. When was it able to be done before?  A. With my first son. Q. Do you know whether or not and your first son, Santana; correct?  A. Correct. Q. Was born by C-section, correct? A. Correct. Q. And who was the doctor that you saw for Santana?  A. I don't recall her name. Q. Was it at Howard University? A. Correct. Q. And do you know whether or not there was any scarring that was later identified from the C-section that you received at Howard University? A. No, there was not. There wasn't any. Q. If there had been some, do you think that's the kind of thing that would be shown in medical records of you that would have come later? A. Could you repeat your question.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	was marked for identification.) Q. Ms. Riggins, we're handing you what's been marked as Riggins-1, which I'll represent to you is medical records that relate to your treatment at Prince George Hospital Center in 2013.  Could you take a quick look at that, and then I'll have some quick questions.  A. (Witness complies with request.) Q. Just let me know when you're ready. MR. ZAJDEL: Put it on the record that we reserve the right to make everything confidential after the deposition. Q. I'm not going to ask you about every word, but let me focus on a couple of things here. So Riggins-1 is a document Bates labeled Plaintiff's -2024 and -2025, which again I'll represent to you was produced to us in this case, and it appears to be an operative report for you, Jasmine Riggins. And it references a date of a procedure on 3/18/2013.  Do you see on the top part of the page?

	UasiiIIIe	Т	
	Page 38		Page 40
	George's County on 3/18/2013?	1	A. Uh-huh.
2	A. Yes.	2	Q. I'm sorry.
3	Q. What did you have?	3	A. Yes, yes, yes, My children,
4	A. A C-section.	4	Till Solly.
5	Q. That's when Messiah was born?	5	THE VIDEOGRAPHER: We are going
6	A. Yes.	6	off the record. The time is 12:11 p.m.
7	Q. And you can see that this is a	7	(Recess)
8	two-page record signed by Charles Akoda, M.D	8	THE VIDEOGRAPHER: We are back on
9	not signed but his name appears at the end of the	9	the record. The time is 12:24 p m.
10	document. Correct?	10	MR. SHAFFER: This is Brian
11	A. Yes.	11	Shaffer for ECFMG. We're back on the
12	Q. And if you look well, the top of	12	record after a short break.
13	the page there's a fax server date and time. It	13	We've had a couple of logistical
14	says, "3/19/2013 at 2:42:42 p.m."	14	issues come up this morning with respect
15	Do you see that?	15	to Ms. Riggins and her child care, and we
16	A. Yes.	16	got started a little bit late this morning
17	Q. So does this appear to be a record	17	due to some travel and traffic issues.
18	then that would have been created and sent	18	And so we've been talking offline here to
19	immediately after your C-section with Messiah in	19	try to solve for those things and make
20	March of 2013?	20	sure that we get the deposition completed.
21	MR. ZAJDEL: Objection.	21	And what we've discussed here is
23	A. Yes.	23	that we will adjourn the deposition today
24	Q. That's the date you had the	24	now with the questions that we've gotten asked and answered so far. We will
25	C-section, right, 3/18/2013? A. Yes.	25	
	A. 16s.		reconvene on Monday morning, the 16th,
	Page 39		Page 41
1	Q. If you look at the description here	1	here at the same place starting at 9:30,
	of what occurred, and it's a little bit technical	2	and we will pick up with Ms. Riggins'
3	in medical terms, but if you look at the findings	3	deposition at that point in time.
4	at the bottom of page 1. So flip back to the first	4	This is being done as an
	page of it. Under Findings it says, "Male infant,		This is being done as an
		5	accommodation to schedules and not for any
6	encephalic presentation."	6	accommodation to schedules and not for any other reason, and so for that reason I've
7	Do you see that?	6 7	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and
7 8	Do you see that? A. Yes.	6 7 8	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll
7 8 9	Do you see that? A. Yes. Q. Do you understand that to be	6 7 8 9	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with
7 8 9 10	Do you see that? A. Yes. Q. Do you understand that to be Messiah, when he went in to do the C-section,	6 7 8 9	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person,
7 8 9 10 11	Do you see that? A. Yes. Q. Do you understand that to be Messiah, when he went in to do the C-section, that's the male infant that he saw?	6 7 8 9 10	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person, witness, Ms. Russell, anybody else about
7 8 9 10 11 12	Do you see that? A. Yes. Q. Do you understand that to be Messiah, when he went in to do the C-section, that's the male infant that he saw? A. Yes.	6 7 8 9 10 11 12	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person, witness, Ms. Russell, anybody else about the case, about her testimony here today,
7 8 9 10 11 12 13	Do you see that? A. Yes. Q. Do you understand that to be Messiah, when he went in to do the C-section, that's the male infant that he saw? A. Yes. Q. Okay. And the next sentence,	6 7 8 9 10 11 12 13	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person, witness, Ms. Russell, anybody else about the case, about her testimony here today, her testimony that she'll give on Monday.
7 8 9 10 11 12 13 14	Do you see that?  A. Yes.  Q. Do you understand that to be  Messiah, when he went in to do the C-section, that's the male infant that he saw?  A. Yes.  Q. Okay. And the next sentence, section of that finding says, "Significant scarring	6 7 8 9 10 11 12 13	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person, witness, Ms. Russell, anybody else about the case, about her testimony here today, her testimony that she'll give on Monday. It will be as if we were picking up right
7 8 9 10 11 12 13 14	Do you see that? A. Yes. Q. Do you understand that to be Messiah, when he went in to do the C-section, that's the male infant that he saw? A. Yes. Q. Okay. And the next sentence, section of that finding says, "Significant scarring and adhesion formation."	6 7 8 9 10 11 12 13 14 15	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person, witness, Ms. Russell, anybody else about the case, about her testimony here today, her testimony that she'll give on Monday. It will be as if we were picking up right now. Instead we will be picking up Monday
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7 8 9 10 11 12 13 14 15 16 17 18	Do you see that? A. Yes. Q. Do you understand that to be Messiah, when he went in to do the C-section, that's the male infant that he saw? A. Yes. Q. Okay. And the next sentence, section of that finding says, "Significant scarring and adhesion formation." Do you see that? A. Yes. Q. And so does that indicate that in addition to finding Messiah when he went in to do	6 7 8 9 10 11 12 13 14 15 16 17 18	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person, witness, Ms. Russell, anybody else about the case, about her testimony here today, her testimony that she'll give on Monday. It will be as if we were picking up right now. Instead we will be picking up Monday at 9:30.  That will include no text messages, no, emails. She also had agreed that she'll not do any research or go online or
77 8 9 10 11 12 13 14 15 16 17 18 19	Do you see that? A. Yes. Q. Do you understand that to be Messiah, when he went in to do the C-section, that's the male infant that he saw? A. Yes. Q. Okay. And the next sentence, section of that finding says, "Significant scarring and adhesion formation." Do you see that? A. Yes. Q. And so does that indicate that in addition to finding Messiah when he went in to do the C-section, he also saw significant scarring and	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person, witness, Ms. Russell, anybody else about the case, about her testimony here today, her testimony that she'll give on Monday. It will be as if we were picking up right now. Instead we will be picking up Monday at 9:30.  That will include no text messages, no, emails. She also had agreed that she'll not do any research or go online or look at any documents or do anything other
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Do you see that?  A. Yes. Q. Do you understand that to be Messiah, when he went in to do the C-section, that's the male infant that he saw? A. Yes. Q. Okay. And the next sentence, section of that finding says, "Significant scarring and adhesion formation." Do you see that? A. Yes. Q. And so does that indicate that in addition to finding Messiah when he went in to do the C-section, he also saw significant scarring and adhesion formation section? A. Okay.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	accommodation to schedules and not for any other reason, and so for that reason I've discussed with both counsel and Ms. Riggins the understanding that she'll have no substantive discussions with anyone, including her counsel, any person, witness, Ms. Russell, anybody else about the case, about her testimony here today, her testimony that she'll give on Monday. It will be as if we were picking up right now. Instead we will be picking up Monday at 9:30.  That will include no text messages, no, emails. She also had agreed that she'll not do any research or go online or look at any documents or do anything other than what she came here today prepared to talk about.

	Jasmine	
	Page 42	
1	THE WITNESS: Yes.	
2	MR. ZAJDEL: With the exception	
3	that I'm certainly going to send an email	
4	with a date and the time to be here on	
5	Monday. You said no communication. I	
6	just want to make sure, no substantive	
7	communication about the contents of the	
8	deposition. That's agreed.	
9	MR. SHAFFER: And then we will	
10	continue with Ms. Riggins' deposition on	
11	Monday at 9:30. After we complete that	
12	we'll move forward with the other	
13	deposition that's been noticed for 10:30	
14	but that we've agreed will start after	
15	the completion of Ms. Riggins. Correct?	
16	MR. ZAJDEL: Yes, and I will take	
17	care of adjusting Ms. Russell to let her	
18	know.	
19	MR. SHAFFER: I think that is it	
20	for the record here today, and we will	
21	•	
22	pick back up on Monday.	
23	THE VIDEOGRAPHER: We are going	
24	off the record. The time is 12:27 p.m.	
	(Proceedings adjourned at	
25	12:26 p.m.)	
	Page 43	
1	DISTRICT OF COLUMBIA: SS	
2	I, Barbara DeVico, a Registered Court Reporter	
3	of the District of Columbia, do hereby certify	
4	that these proceedings took place before me at the	
5	time and place herein set out, and the proceedings	
6	were recorded stenographically by me and this	
7	transcript is a true record of the proceedings.	
8	transcript is a due record of the proceedings.	
9	I further certify that I am not of counsel to	
10	any of the parties, nor an employee of counsel nor	
11	related to any of the parties, nor in any way	
12	interested in the outcome of this action.	
13	merened in the outcome of this action.	
14		
15		
16		
17	BARRADA DAVICO CDD DMD	
18	BARBARA DeVICO, CRR, RMR	
19		
	My Commission Evaluation	
20	My Commission Expires:	
21	July 31, 2023	
22		
23		
24		
25		
		1

## Case 2:18-cv-05629-JDW Document 32-37, Filed 10/07/19 Page 14 of 40 Jasmine Riggins

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1
            IN THE UNITED STATES DISTRICT COURT
2
         FOR THE EASTERN DISTRICT OF PENNSYLVANIA
3
4
5
     MONIQUE RUSSELL, JASMINE
6
     RIGGINS, ELSA M. POWELL
7
                               : Civil Action No.
     and DESIRE EVANS,
                   Plaintiffs, : 18-5629
8
9
     v.
10
     EDUCATIONAL COMMISSION FOR
11
     FOREIGN MEDICAL GRADUATES,
12
                   Defendant.
13
14
15
                         Volume II
    Continued Videotaped Deposition Of JASMINE RIGGINS
16
17
                     Washington, D.C.
18
                Monday, September 16, 2019
19
                          9:56 a.m.
20
21
22
     Job No. 88391
23
     Pages: 44 - 145
24
     Reported by: Dana C. Ryan, RPR, CRR, CSR (GA)
25
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## Case 2:18-cv-05629-JDW Document 32-37, Filed 10/07/19 Page 15 of 40 Jasmine Riggins

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1		1	CONTENTS	
2		2	EXAMINATION OF JASMINE RIGGINS:	PAGE:
3		3	By Mr. Klayman 51	
4		4	By Mr. Shaffer 111	
5	September 16, 2019	5		
6	9:56 a.m.	6		
7		7		
8		8	EXHIBITS	
9		9	(Attached to the Transcript)	
10	Continued Videotaped Deposition of JASMINE	10	RIGGINS DEPOSITION PAGE:	
11	RIGGINS, held at the law offices of Morgan, Lewis	11	Exhibit 2 September 23, 2016 J Unity 71	
12	& Bockius, LLP, 1111 Pennsylvania Avenue,	12	Health Care Progress Note	
13	Northwest, Washington, D.C., before Dana C. Ryan,	13	For Jasmine Riggins, Bates	
14	Registered Professional Reporter, Certified	14	Stamped Plaintiffs0000006408	
15	Realtime Reporter, Certified Shorthand Reporter	15	Through 0000006411	
16	(GA) and Notary Public in and for the District of	16	Exhibit 3 February 19, 2017 J Unity 78	
17	Columbia.	17	Health Care Progress Note	
18		18	For Jasmine Riggins, Bates	
19		19	Stamped Plaintiffs0000007576	
20		20	Through 0000007579	
21		21	Timough ooodoo7279	
22		22		
23		23		
24		24		
25		25		
	Page 46			Page 48
1	APPEARANCES	1	EXHIBITS CONTINUED	)
2		2	(Attached to the Transcript)	
3	ON BEHALF OF THE PLAINTIFFS:	3	RIGGINS DEPOSITION	PAGE:
4	CORY L. ZAJDEL, Esquire	4	Exhibit 4 Plaintiff Jasmine Riggins'	82
5	Z Law, LLC	5	Supplemental Answers To First	
6	2345 York Road, #B-13	6	Set Of Interrogatories And	
7	Timonium, Maryland 21093	7	Supplemental Responses To	
8	Telephone: (443) 213-1977	8	First Set Of Requests For	
9	Email: clz@zlawmaryland.com	9	<b>Production Of Documents</b>	
10	·	10	Exhibit 5 September 7, 2017 J Unity	87
11	ON BEHALF OF THE DEFENDANT:	11	Health Care Progress Note	
		12	•	
12	BARRY W. SHAFFER, Esquire	1-2	roi jasiiille Riggins, Dates	
12 13	BARRY W. SHAFFER, Esquire MATTHEW D. KLAYMAN, Esquire	13	For Jasmine Riggins, Bates Stamped Plaintiffs0000006442	
			Stamped Plaintiffs0000006442	
13	MATTHEW D. KLAYMAN, Esquire	13	Stamped Plaintiffs0000006442 Through 0000006444	90
13 14	MATTHEW D. KLAYMAN, Esquire Morgan, Lewis & Bockius, LLP 1701 Market Street	13 14	Stamped Plaintiffs0000006442 Through 0000006444 Exhibit 6 October 13, 2017 J Unity	90
13 14 15	MATTHEW D. KLAYMAN, Esquire Morgan, Lewis & Bockius, LLP 1701 Market Street Philadelphia, Pennsylvania 19103	13 14 15	Stamped Plaintiffs0000006442 Through 0000006444 Exhibit 6 October 13, 2017 J Unity Health Care Progress Note	90
13 14 15 16	MATTHEW D. KLAYMAN, Esquire Morgan, Lewis & Bockius, LLP 1701 Market Street Philadelphia, Pennsylvania 19103 Telephone: (215) 963-5100	13 14 15 16	Stamped Plaintiffs0000006442 Through 000006444 Exhibit 6 October 13, 2017 J Unity Health Care Progress Note For Jasmine Riggins, Bates	90
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		Page 49		Page 51
1	EXHIBITS CONTINUED		1	2
2	(Attached to the Transcript)		2	Graduates, the defendant.
3	RIGGINS DEPOSITION	PAGE:	3	(Mr. Shaffer exits the deposition
4	Exhibit 9 Complaint Filed To Initiate	101	4	proceedings.)
5	The Lawsuit On November 14,		5	
6	2018		6	JASMINE RIGGINS,
7	Exhibit 10 April 18, 2019 J Unity	103	7	having been duly sworn, testified as follows:
8	Health Care Progress Note		8	
9	For Jasmine Riggins, Bates		9	EXAMINATION BY COUNSEL FOR THE DEFENDANT
10	Stamped Plaintiffs0000006488		10	BY MR. KLAYMAN:
11	Through 0000006490		11	Q Good morning, Ms. Riggins.
12	Exhibit 11 Plaintiff Jasmine Riggins'	105	12	A Good morning.
13	Responses To Defendants'		13	Q We met a moment ago, but I'm Matthew
14	Requests For Admissions,		14	Klayman. I'm colleagues with Brian Shaffer. I'm
15	Bates Stamped		15	going to ask you some questions this morning.
16	Plaintiffs0000006513 Through		16	A Okay.
17	000006537		17	Q We're picking up from a deposition that
18	Exhibit 12 Stipulation Of Dismissal	114	18	began on Thursday; correct?
19	Without Prejudice, Bates		19	A Correct.
20	Stamped Plaintiffs0000118860		20	Q Now, between Thursday and today, have
21	Through 0000118863		21	you had any substantive communications about your
22	Exhibit 13 First Amended Class Action	120	22	testimony with anybody?
23	Complaint		23	A No.
24	Exhibit 14 Claimants' Certificate Of	124	24	Q Have you done any independent research
25	Merit		25	about the substance of your testimony or the facts
		Page 50		Page 52
		I age 50		
1	PROCEEDINGS		1	
1 2	PROCEEDINGS THE VIDEOGRAPHER: We are now	on the	1 2	or circumstances of the case?
2	THE VIDEOGRAPHER: We are now		2	or circumstances of the case?  A No.
2 3	THE VIDEOGRAPHER: We are now record. My name is David Campbell. I am th	ie	2	or circumstances of the case?  A No.  Q I understand that on Thursday you were
2 3 4	THE VIDEOGRAPHER: We are now record. My name is David Campbell. I am the videographer for Golkow Litigation Services.	ie	2 3 4	or circumstances of the case?  A No.  Q I understand that on Thursday you were asked about certain communications that you had
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	Jasmine	1\_	
	Page 53		Page 55
1	repeat your question?	1	A We didn't have that issue at all.
2	BY MR. KLAYMAN:	2	Q Just making sure.
3	Q So were you asked to look for copies of	3	A No, that was not an issue.
4	communications you had with Monique Russell?	4	Q Okay. Great.
5	A Yes.	5	Okay. Now, we're here today because
6	Q Did you find any communications with	6	you've brought a lawsuit against the Educational
7	Monique Russell?	7	Commission for Foreign Medical Graduates; correct?
8	A I didn't look for them.	8	A Correct.
9	Q Oh, you didn't look for them?	9	Q I'm going to refer to them as ECFMG, so
10	A No.	10	you'll understand what I mean when I say ECFMG?
11	Q Okay. Is that something you would be	11	A Correct.
12	willing to do?	12	Q And you allege that you've suffered
13	A Yes.	13	emotional distress; correct?
14	Q Okay. Is that when do you think	14	A Correct.
15	you'd be able to complete a search for	15	Q And that distress was the result of
16	communications you had with Monique Russell?	16	learning about Dr. Akoda's guilty plea; is that
17	A I will try to get that done by the end	17	correct?
18	of this week.	18	A I'm sorry?
19	Q Okay.	19	Q So the the emotional distress that's
20	A Yes.	20	the subject of the lawsuit
21	Q Great.	21	A Uh-huh.
22	This was the subject of written	22	Q when did that start?
23	communications from Mr. Shaffer, my colleague, so	23	A Right when I found out about him being
24	I want to just make sure that we have on the	24	a fake doctor.
25	record that you'll go take a look and that	25	Q And when about was that, if you recall?
		_	
	Page 54		Page 56
1	Page 54 responsive communications would be produced	1	Page 56  A A couple of years ago.
1 2	responsive communications would be produced.	1 2	A A couple of years ago.
2	responsive communications would be produced. MR. ZAJDEL: Well, she testified she		<ul><li>A A couple of years ago.</li><li>Q Was it, you know, talking 2015, 2016?</li></ul>
	responsive communications would be produced.  MR. ZAJDEL: Well, she testified she will look for them and she'll produce them to me,	2	<ul><li>A Couple of years ago.</li><li>Q Was it, you know, talking 2015, 2016?</li><li>A Yeah, around that time, 2016.</li></ul>
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	Page 57		Page 59
1	emotional distress?	1	learned about the basis for this lawsuit, you
2	A Correct.	2	learned about it from Facebook; is that correct?
3	Q So you would say that anyone that you	3	A Correct, from
4	contend did anything to enable Dr. Akoda to	4	Q And that was from a post by Monique
5	practice medicine is responsible, in whole or in	5	Russell?
6	part, for your emotional distress?	6	A Correct.
7	A Correct.	7	Q And that's one of the communications
8	Q Tell me about your emotional distress.	8	that we were talking about this morning; right?
9	A I feel angry, sad, embarrassed,	9	A Correct.
10	ashamed. My emotions are, like, all over the	10	Q So so you'll go take a look to see
11	place. I can't even put them into as many words	11	if you can find that post that Monique Russell
12	that I can think of. I just can't believe that	12	made that you saw?
13	someone would do that. It's beyond me.	13	A I can try to find that, yes.
14	Q And when you say "that," what are you	14	Q Now, with respect to your emotional
15	referring to?	15	distress, do you have anxiety or worry?
16	A To pretend to be someone that they're	16	A When it comes to physicians.
17	not, to practice something that they had no rights	17	Q So not in general?
18	to practice without the proper process of it all.	18	A No, not necessarily.
19	Q And by "proper process of it all," what	19	Q Do you have a depressed mood?
20	do you mean?	20	A No.
21	A Going about it the correct way.	21	Q Do you have suicidal thoughts?
22	Q And by "the correct way," you mean	22	A No.
23	what?	23	Q Are you able to laugh and see the funny
24	A Receiving proper documents, being	24	side of things?
25	truthful, being honest, doing the things that a	25	A Yes.
	Page 58		Page 60
	E		1 age 00
1	real doctor would do.	1	Q Do you look forward with enjoyment to
1 2		1 2	_
	real doctor would do.		Q Do you look forward with enjoyment to
2	real doctor would do.  Q So you're saying that a real doctor would be honest?  A Correct.	2	<ul> <li>Q Do you look forward with enjoyment to things?</li> <li>A Yes.</li> <li>Q Do you blame yourself unnecessarily</li> </ul>
2 3	real doctor would do.  Q So you're saying that a real doctor would be honest?  A Correct.  Q And someone who is not honest is not a	2 3	Q Do you look forward with enjoyment to things? A Yes.
2 3 4 5 6	real doctor would do.  Q So you're saying that a real doctor would be honest?  A Correct.  Q And someone who is not honest is not a real doctor?	2 3 4 5 6	Q Do you look forward with enjoyment to things?  A Yes. Q Do you blame yourself unnecessarily when things go wrong? A No.
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	Jasmine	R.	rggriis
	Page 61		Page 63
1	Q If you had to give your best estimate,	1	unhappy for so far as this case, just knowing
2	are we talking a few a few weeks, many years?	2	what I know about it, the way it makes me feel,
3	A Yeah, probably like a couple of years.	3	the fact that I had to I got a second second
4	Q Couple of years?	4	C-section, and I didn't have to get that. That
5	A (Witness nods head.)	5	makes me very unhappy sometimes, yes.
6	Q If you had to give your best estimate	6	Q But to your testimony just now, there
7	about when that began	7	are other things going on in your life that also
8	A I can't.	8	make you very unhappy or, as I asked, so unhappy
9	Q You can't.	9	that you cry?
10	Do you feel sad or miserable?	10	A Okay. So there's one thing. My
11	A Not miserable, no. I I mean, in	11	grandmother had back surgery and it made me sad.
12	general, no, not sad.	12	That was about it.
13	Q Are you so unhappy that you cry?	13	Q I'm sorry to hear that. That just
14	A Are we, like, in general? At times	14	A Yeah, so
15	I feel like these questions can be at times I	15	Q And that's what you were referring to
16	can feel sad to the point where I want to cry, so	16	when you
17	are you speaking in general, at times?	17	A Correct.
18	Q Sure.	18	Q said you'd rather not talk about it?
19	Let's say over the last six months,	19	Now, does the thought of harming
20	have you have you at any time been so unhappy	20	yourself occur to you?
21	that you've cried?	21	A No.
22	A Yes.	22	Q Do you have post-traumatic stress
23	Q And do you recall what made you	23	disorder because of the events giving rise to this
24	unhappy?	24	lawsuit, sometimes known as PTSD?
25	A Yes.	25	A No.
	Page 62		Page 64
1	Q And what was that?	1	Q Have you suffered any physical distress
2	A I don't want to talk about it.	2	after learning about Dr. Akoda in from Monique
3	Q I I understand that you might not	3	Russell's Facebook post?
4	want to talk about it, but you're under oath so	4	A Physically no, not necessarily.
	I I need an answer to the question.	5	Q When you say "not necessarily," is that
6	MR. ZAJDEL: Objection. If it's	6	a no?
7	unrelated if the question is related to the	7	A No.
8	case, then I would agree she would have to talk	8	Q Have you ever been diagnosed with
9	about it. But if it's I'm sorry, if she's	9	depression?
10	saying it's unrelated to the case, I don't know	10	A No.
11	why it would be relevant.	11	Q Have you ever seen a medical
12	MR. KLAYMAN: Well, it's she's	12	professional to discuss depression?
13	bringing a claim for emotional distress, so other	13	A No.
14	things going on in her life that might be factors	14	Q Have you ever discussed your emotional
15	in emotional distress that she's suffering is	15	distress with a medical professional?
16	directly relevant to the claim.	16	A No.
17	MR. ZAJDEL: Well, I wouldn't agree	17	Q If you were asked by a medical
18	with that. I'll have	18	professional about your emotional distress, would
19	MR. KLAYMAN: Let me maybe I'll	19	you tell the truth?
20	let me try a question.	20	A Yes.
21	BY MR. KLAYMAN:	21	Q And if you had been asked by a medical
22	Q Is the cause of that unhappiness that	22	professional in the past about your emotional
23	you referred to completely unrelated to the facts	23	distress, you would have told the truth?
24	of this case?	24	A Yes.
25	A Sometimes. So the things that make me	25	Q Do you typically tell the truth to

		Jasmine	R:	iggins
		Page 65		Page 67
1	medica	al professionals when they ask you questions	1	Dr. King.
2	in the	course of treatment?	2	Did you do anything to research
3	A	Yes.	3	Dr. King before you went to see her for treatment?
4	Q	Have you always told the truth to	4	A Yes.
5	medica	al professionals when they're treating you?	5	Q What did you do?
6	A	Yes.	6	A I asked my cousin about her. I went to
7	Q	When was the last time you saw a	7	the doctor's office to meet her prior to my visit.
8	medica	al professional for treatment, any any	8	Q So you met Dr. King once before you
9	medica	al professional?	9	became a patient?
10	A	Okay. I went to the doctor last month,	10	A Yes.
11	not :	yeah, last month I had a doctor's	11	Q Did you look at Dr. King's resume?
12	appoin	ntment.	12	A No.
13	Q	So that would be I forget what	13	Q Did you ask for references beyond that
14	month	August?	14	of your cousin?
15	A	Yes, in August.	15	A No.
16	Q	August of 2019?	16	Q Did you check to see if Dr. King had
17	A	Yes.	17	any specific credentials or certificates?
18	Q	Okay. And where was that?	18	A No.
19	A	That was Unity Health Care.	19	Q Did you ask to see Dr. King's test
20	Q	What is Unity Health Care?	20	scores or medical school transcript or anything
21	A	It's a doctor's office. It's a clinic.	21	like that?
22	Q	If you recall do you recall which	22	A No.
23	doctor	you were seeing?	23	Q Have you ever switched doctors?
24	Α	Dr. King.	24	A Yes.
25	Q	Dr. King.	25	Q So if you don't like a doctor you're
		Page 66		Page 68
1		Do you know Dr. King's first name?	1	seeing, you you find a new doctor?
2	Α	I don't recall.	2	A Yes.
3	Q	Is Dr. King a man or a woman?	3	Q Now, other than to deliver a child,
4	À	A woman.	4	have you ever been hospitalized?
5	Q	What kind of doctor is Dr. King?	5	A Yes.
6	Ā	She's a physician.	6	Q And when was that?
7	Q	Is she a specialist or a general	7	A I think it was 2015, I believe.
8	_	tioner, if you know?	8	Q And what was the reason for the
9	A	I don't recall.	9	hospitalization?
10	Q	Were you going for a routine physical?	10	A My birth control was giving me some bad
11	À	Correct.	11	side effects.
12	Q	How did you choose Dr. King as your	12	Q Do you remember how long you were in
13	doctor	r?	13	the hospital?
14	A	Well, I was referred to her.	14	A I'm just a overnight, maybe a few
15	Q	Okay. And referred by whom?	15	hours.
16	A	My cousin.	16	Q What was that? I'm sorry.
17	Q	Okay. Your cousin.	17	A It was late morning, and I didn't leave
18		And who is your cousin?	18	until, like, the next morning, so I don't know if
19	A	You need her name?	19	that's considered overnight or a few hours or
20	Q	Just for the record, yeah.	20	Q Sure.
21	A	Oh, okay. Her name is Davida Limes.	21	But you came in on one date and you
22	Q	How do you spell the last name?	22	left on the next date?
23	A	L-I-M-E-S.	23	A It was the same day I got there, maybe
24	Q	L-I-M-E-S.	24	midnight; and I left maybe 9:00 in the next
25		So so your cousin referred you to	25	morning.
			1	

	Jasmine	Λ.	1991115
	Page 69		Page 71
1	Q Oh, I see.	1	some another doctor if you prefer?
2	A So that's why yeah, I didn't know if	2	A Correct.
3	that was just to be technical.	3	Q Did you have insurance when you were
4	Q I appreciate that.	4	treated by Dr. Akoda?
5	So you got in really late at night or	5	A Yes.
6	really early in the morning?	6	Q Do you remember if he was in network or
7	A Yeah.	7	if he if he if his treatment was covered by
8	Q Depending on how you're looking at it,	8	insurance?
9	I guess?	9	A Yes.
10	A Yes.	10	Q Okay.
11	Q And then you left on the same date; it	11	(Riggins Deposition Exhibit 2 was
12	was just several hours later?	12	marked for identification and attached to the
13	A Correct.	13	transcript.)
14	Q Any other times that you were	14	BY MR. KLAYMAN:
15	hospitalized that you recall other than child	15	Q So
16	birth, again?	16	THE COURT REPORTER: Wait a minute.
17	A No, not that I can recall.	17	BY MR. KLAYMAN:
18	Q Have you ever been to an emergency	18	Q The court reporter
19	room?	19	THE COURT REPORTER: Let me give it to
20	A Yes.	20	her.
21	Q About how many times?	21	There you go. Thank you.
22	A A few. I don't recall.	22	BY MR. KLAYMAN:
23	Q Do you recall what what was the	23	Q So you've just been handed a document
24	reason for going to the emergency room?	24	that we've marked Riggins 2. It's a record
25	A Being sick, you know.	25	produced by the plaintiffs that they received from
	•		
	•		Page 72
1	Page 70	1	Page 72 Unity Health Care which is the company we were
1 2	Page 70 Q A variety of reasons?	1 2	Unity Health Care which is the company we were
	Page 70 Q A variety of reasons? A Yes. Correct.		_
2	Page 70  Q A variety of reasons?  A Yes. Correct.  Q Anything traumatic like a for a car	2	Unity Health Care which is the company we were just discussing; right?  A Yes.
2 3	Page 70 Q A variety of reasons? A Yes. Correct.	2 3	Unity Health Care which is the company we were just discussing; right?  A Yes.  Q Okay. And you see that it's dated
2 3 4	Page 70  Q A variety of reasons?  A Yes. Correct.  Q Anything traumatic like a for a car accident, for example, or  A No.	2 3 4	Unity Health Care which is the company we were just discussing; right?  A Yes.
2 3 4 5	Page 70  Q A variety of reasons?  A Yes. Correct.  Q Anything traumatic like a for a car accident, for example, or  A No.	2 3 4 5	Unity Health Care which is the company we were just discussing; right?  A Yes. Q Okay. And you see that it's dated September 23rd, 2016? A Yes.
2 3 4 5 6	Page 70  Q A variety of reasons?  A Yes. Correct.  Q Anything traumatic like a for a car accident, for example, or  A No.  Q All right. Do you have health	2 3 4 5 6	Unity Health Care which is the company we were just discussing; right?  A Yes. Q Okay. And you see that it's dated September 23rd, 2016? A Yes.
2 3 4 5 6 7	Page 70  Q A variety of reasons? A Yes. Correct. Q Anything traumatic like a for a car accident, for example, or A No. Q All right. Do you have health insurance?	2 3 4 5 6 7	Unity Health Care which is the company we were just discussing; right?  A Yes. Q Okay. And you see that it's dated September 23rd, 2016? A Yes. Q And just for the record, it's Bates
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	Jasmine	K.	rggriis
	Page 73		Page 75
1	Q Do you know who Alison Lesht is? Her	1	the first item at the top, in the third line down
2	name is on the top right next to progress note.	2	all the way on the right, it says, Two sons -
3	A I don't recall.	3	Healthy.
4	Q From the "NP," I would gather that	4	Is that do you see what I'm what
5	she's a nurse practitioner.	5	I'm referring to?
6	Does that refresh your recollection	6	A Yes.
7	or	7	Q Was that true at the time that was
8	A No.	8	true at the time that this was written; right?
9	Q Now, you see the first bolded language	9	A Yes.
10	at the top of page 6408, it says, Reason for	10	Q All right. Now, under moving on to
11	Appointment.	11	the next section, which is Social History, we're
12	Do you see that?	12	going to go through the first one is tobacco
13	A Yes.	13	use. And it says, Tobacco Use Questions Current
14	Q And it says, Medical - Adult EST	14	or past tobacco use: Current some day smoker.
15	Patient. That was next to 1.	15	Do you see that?
16	And then 2, Accepted HIV Test - Serum	16	A Yes.
17	Test Needed.	17	Q Was that and that was true and
18	3, Physical Exam.	18	correct in September 2016?
19	Do you see that?	19	A Correct.
20	A Yes.	20	Q Skipping ahead to Drug/Alcohol Use, do
21	Q Does that sound like the kinds of	21	you see where I'm
22	treatment you've gotten from Unity Health Care in	22	A Yes.
23	the past?	23	Q Do you see where I am?
24	A Yes.	24	A Yes.
25	Q Okay. So next it says, History of	25	Q So it says, Drug Use Questions. Date
	Q Onay. So now it says, instory or		Q Bon sujs, Brug Ose Questions. Bute
		-	
	Page 74		Page 76
1	Present Illness. And then it starts, PHQ-2.	1	updated 09/23/2016. Past or current drug use?
1 2	Present Illness. And then it starts, PHQ-2.  Do you know what PHQ-2 means?	1 2	updated 09/23/2016. Past or current drug use? Yes - current use. Which drugs used: Marijuana.
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	Jasmine	1.	1991115
	Page 77		Page 79
1	MR. ZAJDEL: Yes. You're you're	1	Q So the court reporter just handed you
2	asking a question about I've instructed her not	2	the document beginning with Bates number 7576
3	to answer, and	3	that's been marked Riggins Exhibit 3.
4	MR. KLAYMAN: I'm just trying to	4	And this, again, is a Unity Health Care
5	understand the basis. Is it the Fifth Amendment?	5	record; right?
6	MR. ZAJDEL: Yes.	6	A Yes.
7	BY MR. KLAYMAN:	7	Q And the date for this one is
8	Q And you're accepting counsel's	8	February 19th, 2017. Do you see that
9	instruction not to answer?	9	A Yes.
10	A Yes.	10	Q on the top left?
11	MR. ZAJDEL: Also, just and I'm not	11	And you were still a patient at Unity
12		12	Health Care at this time?
13	trying to make a speaking objection. I just want	13	
	to put on the record and we did this in the		
14	previous deposition that there's a with all	14	Q Have you been a patient at Unity Health
15	these medical records and some testimony will be	15	Care continuously from, I guess, the last record,
16	some information that we think deserves a	16	September 2016, at least until today?
17	confidentiality stamp. We just want to reserve	17	A Correct.
18	the right to mark anything confidential before a	18	Q And, again, next to the progress note,
19	final transcript is released, including any	19	it says Martine H. Tchinda, NP.
20	exhibits.	20	Do you know who Martine H. Tchinda, NP
21	MR. KLAYMAN: Okay. That's that's	21	is?
22	a your comment is noted, and we can we can	22	A No.
23	discuss that.	23	Q But, again, the "NP" seems to signify
24	BY MR. KLAYMAN:	24	nurse practitioner, so it could be someone that
25	Q Now, going down to the section on OB	25	treated you; correct?
	Page 78		Page 80
1	Page 78  History If you'll see it's right in the middle	1	Page 80
1 2	History. If you'll see, it's right in the middle	1 2	MR. ZAJDEL: Objection.
2	History. If you'll see, it's right in the middle of that page?	2	MR. ZAJDEL: Objection. THE WITNESS: Right.
2 3	History. If you'll see, it's right in the middle of that page?  A Yes.	2 3	MR. ZAJDEL: Objection. THE WITNESS: Right. BY MR. KLAYMAN:
2 3 4	History. If you'll see, it's right in the middle of that page?  A Yes.  Q It says, Total pregnancies, four;	2 3 4	MR. ZAJDEL: Objection. THE WITNESS: Right. BY MR. KLAYMAN: Q So moving down to the reason for
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	Jasmine		
	Page 81		Page 83
1	Q Does that refresh your recollection at	1	before that, there's a certificate of service, and
2	all about when the abortions happened?	2	then the page before that, there's a page called
3	A Yes.	3	Verification.
4	Q And when did those happen?	4	A Oh, yeah.
5	A 2016.	5	Q It has a 14 at the bottom.
6	Q 2016.	6	Do you see that?
7	A About that time somewhat.	7	A Yes.
8	Q Now, if you move out move on to the	8	Q Okay. And it says, I, Jasmine Riggins,
9	next page, so 7577. I'm looking at smack in the	9	hereby aver that the factual statements in the
10	middle where it says, Review of Systems.	10	foregoing answers to interrogatories are true and
11	Do you see that in the bolded language?	11	correct to the best of my knowledge, information
12	A Yes.	12	and belief, and that these answers are made
13	Q So if you go down to the last	13	subject to the penalties relating to unsworn
14	underlined item in that section where it says,	14	falsification to authorities.
15	Psych, do you see that?	15	Right?
16	A Yes.	16	A Yes.
17	Q And it says, Negative for	17	Q And then it's dated June 13, 2019; is
18	anxiety/worry, depressed mood, suicidal thoughts.	18	that right?
19	Did I read that right?	19	A Yes.
20	A Yes.	20	Q And then there's a line for and a
21	Q And that was a true and accurate	21	signature that are those your signature for
22	accurate statement of your well-being in	22	Jasmine Riggins?
23	February 2017?	23	A Yes.
24	A Yes.	24	Q Does that refresh your recollection
25	MR. KLAYMAN: That will be 4.	25	about if whether you've seen this document before?
	Page 82		Dogo 94
l	1 age 62		Page 84
1	(Riggins Deposition Exhibit 4 was	1	A Yes.
1 2	_	1 2	_
	(Riggins Deposition Exhibit 4 was		A Yes.
2	(Riggins Deposition Exhibit 4 was marked for identification and attached to the		<ul><li>A Yes.</li><li>Q Earlier today, you testified that you</li></ul>
2	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)	2 3	A Yes.  Q Earlier today, you testified that you weren't sure of when you saw the Facebook post
2	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.) BY MR. KLAYMAN:	2 3 4	A Yes. Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell.
2 3 4 5	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter has just handed	2 3 4 5	A Yes. Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell. Do you recall that?
2 3 4 5 6	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter has just handed you the document that's been marked Riggins	2 3 4 5 6	A Yes. Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell. Do you recall that? A You said that I wasn't sure that
2 3 4 5 6 7	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter has just handed you the document that's been marked Riggins Exhibit 4.	2 3 4 5 6 7	A Yes.  Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell.  Do you recall that?  A You said that I wasn't sure that Q Yeah, that you said you weren't sure.
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2 3 4 5 6 7 8	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter has just handed you the document that's been marked Riggins Exhibit 4.  Do you recognize the document?  A I can't say yes or no.	2 3 4 5 6 7 8	A Yes. Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell. Do you recall that? A You said that I wasn't sure that Q Yeah, that you said you weren't sure. A Okay. Q Of the date; is that right?
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2 3 4 5 6 7 8 9 10	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter has just handed you the document that's been marked Riggins Exhibit 4.  Do you recognize the document?  A I can't say yes or no.  Q Are you familiar with with interrogatories?	2 3 4 5 6 7 8 9 10	A Yes. Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell. Do you recall that? A You said that I wasn't sure that Q Yeah, that you said you weren't sure. A Okay. Q Of the date; is that right? A The date, yes. Q Yes.
2 3 4 5 6 7 8 9 10 11 12	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter has just handed you the document that's been marked Riggins Exhibit 4.  Do you recognize the document?  A I can't say yes or no.  Q Are you familiar with with interrogatories?  A Yes.	2 3 4 5 6 7 8 9 10 11 12	A Yes. Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell. Do you recall that? A You said that I wasn't sure that Q Yeah, that you said you weren't sure. A Okay. Q Of the date; is that right? A The date, yes. Q Yes. A Correct.
2 3 4 5 6 7 8 9 10 11 12 13	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN: Q So the court reporter has just handed you the document that's been marked Riggins Exhibit 4.  Do you recognize the document? A I can't say yes or no. Q Are you familiar with with interrogatories? A Yes. Q So so as you can see from the title	2 3 4 5 6 7 8 9 10 11 12 13	A Yes. Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell. Do you recall that? A You said that I wasn't sure that Q Yeah, that you said you weren't sure. A Okay. Q Of the date; is that right? A The date, yes. Q Yes. A Correct. Q So if you could turn to page 3 of the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	(Riggins Deposition Exhibit 4 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter has just handed you the document that's been marked Riggins Exhibit 4.  Do you recognize the document?  A I can't say yes or no.  Q Are you familiar with with interrogatories?  A Yes.  Q So so as you can see from the title there, this document is entitled, Plaintiff Jasmine Riggins' Supplemental Answers to First Set of Interrogatories and Supplemental Responses to First Set of Requests for Production of Documents.  A Uh-huh.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Yes. Q Earlier today, you testified that you weren't sure of when you saw the Facebook post from Monique Russell. Do you recall that? A You said that I wasn't sure thatQ Yeah, that you said you weren't sure. A Okay. Q Of the date; is that right? A The date, yes. Q Yes. A Correct. Q So if you could turn to page 3 of the interrogatories. A Okay. Q I'll just direct you to the very bottom, the first full line where it says, Plaintiff began experiencing these injuries when
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	Jasmine		1991110
	Page 85		Page 87
1	A Correct.	1	A Correct.
2	Q And and when was that?	2	Q correct?
3	A In 2017.	3	Have you thought about going to see a
4	Q In July 2017; right?	4	health care provider for treatment of your
5	A Yes.	5	injuries?
6	Q Okay. So all of the medical records	6	A Yeah, I thought about it.
7	that we've looked at so far so that would be	7	Q And you decided against it?
8	Riggins Exhibit 2 and Exhibit 3 were from	8	A It just so it was just a thought,
9	before July of 2017; right?	9	like yeah, you could say I decided against it.
10	You can pull them up again if you want	10	Just wasn't something I really wanted to keep
11	to	11	talking about.
12	A Yeah, they say this is 2016.	12	(Riggins Deposition Exhibit 5 was
13	Yes.	13	marked for identification and attached to the
14	Q How soon after learning, as you say in	14	transcript.)
15	your interrogatory response, that Akoda was not	15	BY MR. KLAYMAN:
16	really a doctor, did you begin experiencing	16	Q So the court reporter has handed you
17	emotional distress?	17	the document that's been marked Riggins Exhibit 5
18	A Immediately once I	18	which begins on Bates number 6442. And this again
19	Q Immediately?	19	looks like a Unity Health Care record; right?
20	A Yeah, once I found out, I just felt	20	A Yes.
21	really bad, yeah.	21	Q And in the top left, the date here is
22	Q Did you experience the emotional	22	September 7th, 2017
23	distress continuously after that time, or was it	23	A Yes.
24	intermittent?	24	Q is that right?
25	A Yeah, intermittent.	25	So that's after the July 2017 date that
1	Page 86	1	Page 88
1 2	Q Intermittent? A Yeah.	1 2	was referred to in the interrogatories?  A Correct.
3		3	
4	Q So it would come and it would go, in other words?	Δ	Q And up in the top right where it says progress note, this time it says, Yolanda E.
5		5	
6	A Yes.	6	Do you know who Dr. Klemmer is?
7	Q How frequently would you experience the emotional distress?	7	•
8		8	A Yes. Q And who is Dr. Klemmer?
	A More often than not, yeah. The more I	0	O And who is Dr. Klemmer?
9	thought shout it it resished as a second	0	
110	thought about it, it weighed on me, yeah.	9	MR. ZAJDEL: Objection: misstates
10	Q And how often would you think about it?	10	MR. ZAJDEL: Objection: misstates facts. It says certified nurse
11	<ul><li>Q And how often would you think about it?</li><li>A Almost every day, every other day. I</li></ul>	10 11	MR. ZAJDEL: Objection: misstates facts. It says certified nurse MR. KLAYMAN: Oh, sure. I forgot.
11 12	Q And how often would you think about it? A Almost every day, every other day. I tried not to think about it, but it would always	10 11 12	MR. ZAJDEL: Objection: misstates facts. It says certified nurse MR. KLAYMAN: Oh, sure. I forgot. Forgive me.
11 12 13	Q And how often would you think about it? A Almost every day, every other day. I tried not to think about it, but it would always come up in my mind.	10 11 12 13	MR. ZAJDEL: Objection: misstates facts. It says certified nurse MR. KLAYMAN: Oh, sure. I forgot. Forgive me. BY MR. KLAYMAN:
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11 12 13 14 15 16 17 18 19 20 21 22 23	Q And how often would you think about it? A Almost every day, every other day. I tried not to think about it, but it would always come up in my mind. Q So on page 3 of the of Exhibit 4, the second line from the bottom says, Plaintiff has not seen any health care providers for treatment of these injuries. Do you see that? A Yes. Q And that was a true and accurate statement when these were when you signed the verification in June of 2019; correct? A Correct.	10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. ZAJDEL: Objection: misstates facts. It says certified nurse

	Jasmine	1/_	1991115
	Page 89		Page 91
1	A Back in 27 2018 after I had my baby.	1	Yolanda E. Klemmer; right?
2	Q But you're not a current patient of	2	A Yes.
3	Yolanda Klemmer?	3	Q And here it says go through again
4	A No.	4	what we did in the last record.
5	Q And it was your understanding when you	5	So Reason for Appointment, 1, medical,
6	were a patient that she was a medical doctor?	6	dash, OB visit.
7	A Yes.	7	Do you see that?
8	Q Would you refer to her as Dr. Klemmer	8	A Yes.
9	when you saw her?	9	Q And that's a true and accurate
10	A Yes.	10	statement for why you were seeing Yolanda Klemmer
11	Q Now, if you look at, again, the Reason	11	in October 2017?
12	for Appointment	12	A Yes.
13	That will be the first bolded language.	13	Q Klemmer was treating you in connection
14	Do you say where I'm at?	14	with your with the birth of your third child;
15	A Yeah.	15	is that right?
16	Q Okay. So it says, 1, medical - OB	16	A Yes.
17	visit. 2, prenatal care.	17	Q So again moving down to the PHQ-2,
18	And that's a true and accurate	18	PHQ-2, little interest or pleasure in doing
19	statement of the treatment you were receiving from	19	things. Little interest or pleasure in doing
20	Klemmer in September 2017?	20	things, no. Feeling down depressed or hopeless,
21	A Yes.	21	no.
22	Q Moving on to the next bolded language	22	Do you see that?
23	where it says History of Present Illness, do you	23	A Yes.
24	see that?	24	Q And that's a true and accurate
25	A Yes.	25	statement of your well-being in October 2017?
	Paga 00		Paga 02
1	Page 90	1	Page 92
1 2	Q So here is again that reference to	1 2	A Yes.
2	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or	2	<ul><li>A Yes.</li><li>Q Now, moving down to the next underlined</li></ul>
2 3	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or	2	A Yes. Q Now, moving down to the next underlined section which is postpartum visit.
2 3 4	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down,	2 3 4	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this
2 3 4 5	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.	2 3 4 5	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth?
2 3 4 5 6	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?	2 3 4	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes.
2 3 4 5 6	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.	2 3 4 5 6 7	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth
2 3 4 5 6 7 8	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and	2 3 4 5 6 7 8	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017?
2 3 4 5 6 7 8	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in	2 3 4 5 6 7 8	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd.
2 3 4 5 6 7 8 9	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?	2 3 4 5 6 7 8 9	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of
2 3 4 5 6 7 8	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.	2 3 4 5 6 7 8	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth?
2 3 4 5 6 7 8 9 10	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was	2 3 4 5 6 7 8 9 10	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes.
2 3 4 5 6 7 8 9 10 11 12 13	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the	2 3 4 5 6 7 8 9 10 11	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it
2 3 4 5 6 7 8 9 10 11	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)	2 3 4 5 6 7 8 9 10 11 12 13	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions.
2 3 4 5 6 7 8 9 10 11 12 13	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:	2 3 4 5 6 7 8 9 10 11 12 13 14	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in
2 3 4 5 6 7 8 9 10 11 12 13 14	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN: Q So the court reporter just handed you	2 3 4 5 6 7 8 9 10 11 12 13	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4,
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter just handed you another document. This one is Riggins Exhibit 6.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4, 2017.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter just handed you another document. This one is Riggins Exhibit 6.  And it begins on Bates number 6478. And this also	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4, 2017. Newborn date of discharge, October 4, 2017. Date of delivery, October 2nd, 2017.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter just handed you another document. This one is Riggins Exhibit 6. And it begins on Bates number 6478. And this also appears to be a Unity Health Care medical record;	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4, 2017. Newborn date of discharge, October 4, 2017. Date of delivery, October 2nd, 2017. So that's the same date you just said;
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter just handed you another document. This one is Riggins Exhibit 6. And it begins on Bates number 6478. And this also appears to be a Unity Health Care medical record; right?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4, 2017. Newborn date of discharge, October 4, 2017. Date of delivery, October 2nd, 2017. So that's the same date you just said; right?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter just handed you another document. This one is Riggins Exhibit 6. And it begins on Bates number 6478. And this also appears to be a Unity Health Care medical record; right?  A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4, 2017. Newborn date of discharge, October 4, 2017. Date of delivery, October 2nd, 2017. So that's the same date you just said; right? A Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter just handed you another document. This one is Riggins Exhibit 6. And it begins on Bates number 6478. And this also appears to be a Unity Health Care medical record; right?  A Yes.  Q And the date up in the top left is	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4, 2017. Newborn date of discharge, October 4, 2017. Date of delivery, October 2nd, 2017. So that's the same date you just said; right? A Yes. Q Right.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter just handed you another document. This one is Riggins Exhibit 6. And it begins on Bates number 6478. And this also appears to be a Unity Health Care medical record; right?  A Yes.  Q And the date up in the top left is October 13, 2017.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4, 2017. Newborn date of discharge, October 4, 2017. Date of delivery, October 2nd, 2017. So that's the same date you just said; right? A Yes. Q Right. Intrapartum complications, none. Type
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q So here is again that reference to PHQ-2. And it says PHQ-2, little interest or pleasure in doing things. Little interest or pleasure in doing things, no. Feeling down, depressed or hopeless, no.  Did I read that right?  A Yes.  Q And that's and that's a true and accurate statement of your well-being in September 2017; correct?  A Yes.  (Riggins Deposition Exhibit 6 was marked for identification and attached to the transcript.)  BY MR. KLAYMAN:  Q So the court reporter just handed you another document. This one is Riggins Exhibit 6. And it begins on Bates number 6478. And this also appears to be a Unity Health Care medical record; right?  A Yes.  Q And the date up in the top left is October 13, 2017.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Yes. Q Now, moving down to the next underlined section which is postpartum visit. So I gather from postpartum that this is after you gave birth? A Yes. Q When when when did you give birth for in 2017? A It was on October 2nd. Q Okay. So this is within two weeks of the of the birth? A Yes. Q Okay. We're going to read through it and I'll ask you a couple of questions. So, Delivery (if not captured in flowsheet), Maternal date of discharge October 4, 2017. Newborn date of discharge, October 4, 2017. Date of delivery, October 2nd, 2017. So that's the same date you just said; right? A Yes. Q Right.

	Jasmine	K.	
	Page 93		Page 95
1	A I believe so.	1	So you're the named plaintiff in
2	Q You delivered your child in 2017	2	strike that.
3	through a C-section?	3	You were a named plaintiff in
4	A Yes.	4	litigation relating to Dr. Akoda in Maryland; is
5	Q Place of delivery, Washington Hospital	5	that right?
6	Center; is that right?	6	A Yes.
7	A Yes.	7	Q Do you recall when that lawsuit was
8	Q Anesthesia, epidural/spinal. And	8	filed?
9	that's the correct method of anesthesia that you	9	A No, I don't recall.
10	had during delivery?	10	MR. KLAYMAN: This is 7.
11	A Correct.	11	(Riggins Deposition Exhibit 7 was
12	Q Gender, female. I take it that	12	marked for identification and attached to the
13	that's I take it that's	13	transcript.)
14	A Correct.	14	BY MR. KLAYMAN:
15	Q for your daughter?	15	Q So the court reporter has just handed
16	A Yes.	16	you a document that's been marked Riggins
17	Q Birth weight pounds, 7; birth weight	17	Exhibit 7.
18	ounces, 13.	18	Do you recognize the document?
19	So next is postpartum depression	19	A Yes.
20	screening. I have been able to laugh and see the	20	Q And what is it?
21	funny side of things: 0 - As much as I always	21	A It's a class action complaint.
22	could. I have looked forward with enjoyment to	22	Q And it's in the Circuit Court for
23	things: 0 - As much as I ever did. I have blamed	23	Prince George's County, Maryland?
24	myself unnecessarily when things went wrong: 0 -	24	A Correct.
25	No, never. I have been anxious or worried for no	25	Q And your name is in the top left of the
	Page 94		Page 96
1	good reason: 0 - No, not at all. I felt scared or	1	caption, so it says right underneath Monique
2	panicky for no good reason: 0 - No, not at all.	2	Russell, it says Jasmine Riggins, 312 37th Street,
3	Things have been getting on top of me: 0 - No, I	3	Apartment Number 304, Washington, D.C., 20019?
4	have been coping as well as ever. I have been so	4	A Yes.
5	unhappy that I have had difficulty sleeping: 0 -	5	Q And that's you?
6	No, not at all. I have felt sad or miserable:	6	A Yes.
7	0 - No, not at all. I've been so unhappy that I	7	Q And then if you look at the stamp
8	have been crying: 0 - No, never. The thought of	8	that's kind of sideways on the front page, you see
9	harming myself has occurred to me: 0 - Never.	9	the the year is a little fuzzy, I guess, but it
10	Total score: 0. Score is 12 or higher: No.	10	looks like 2000 to my eye it looks like 2017,
11	Negative screening result: Yes.	11	September 11.
12	Did I read that all correctly?	12	Do you see that?
13	A Yes.	13	A Yes.
14	Q Now, I know that was a lot of	14	Q So does that refresh your recollection
15	questions, but was that a true and correct	15	about when the lawsuit was filed in Maryland?
16	statement of your well-being in October 2017?	16	A Yes.
17	A Correct.	17	Q And when was that?
18	Q And then name of child, Taniya?	18	A In September of 2017.
19	A Taniya.	19	Q Okay.
20	Q Taniya?	20	(Riggins Deposition Exhibit 8 was
21	A Yes.	21	marked for identification and attached to the
22	Q Oh. Even better. Taniya Richardson.	22	transcript.)
23	Great.	23	BY MR. KLAYMAN:
24	Just give me one second while I figure	24	Q So the court reporter has handed you a
25	something out.	25	document that's been marked Riggins Exhibit 8, and

	Jasmine	Γ.	1991115
	Page 97		Page 99
1	the Bates number on the bottom is 6480. And it	1	difficulty sleeping: 0 - No, not at all. I have
2	looks like another united Unity Health Care	2	felt sad or miserable: 0 - No, not at all. I
3	medical record; right?	3	have been so unhappy that I have been crying: 0 -
4	A Yes.	4	No, never. The thought of harming myself has
5	Q And in the top left of this first page,	5	occurred to me: 0 - Never. Total score: 2.
6	the date on it is November 9th, 2017.	6	Score is 12 or higher: No. Negative screening
7	Do you see that?	7	result: Yes.
8	A Yes.	8	Did I read that all correctly?
9	Q And again, the progress note has	9	A Yes.
10	Yolanda E. Klemmer; right?	10	Q And is that a true and accurate
11	A Yes.	11	statement of your well-being in November of 2017?
12	Q And this time the Reason for	12	A Yeah.
13	Appointment is you see where I'm at	13	MR. ZAJDEL: Objection.
14	A Yes.	14	THE WITNESS: Sorry. Sorry.
15		15	MR. ZAJDEL: Objection: compound
16	Q looking at the top?	16	
17	So 1, Medical - OB visit; 2, Pregnancy	17	question.  She can answer it.
18	test; 3, Postpartum exam.	18	MR. KLAYMAN: Sure. So so
	Is that a true and correct statement of	19	
19	the reasons you went to Unity Health Care in		MR. ZAJDEL: I think she already did,
20	November 2017?	20	but
21	A Correct.	21	BY MR. KLAYMAN:
22	Q Again, under History of Present	22	Q Yeah. So each of those so each of
23	Illness, it says at the first couple of lines,	23	those is a true statement of your well-being in
24	PHQ-2, little interest or pleasure of doing	24	November 2017?
25	things. Little pleasure or interest in doing	25	A Yes.
	Page 98		Page 100
1	Page 98 things, no. Feeling down, depressed or hopeless,	1	Page 100 Q If you recall earlier, I asked you
1 2		1 2	_
	things, no. Feeling down, depressed or hopeless, no.		Q If you recall earlier, I asked you
2	things, no. Feeling down, depressed or hopeless,	2	Q If you recall earlier, I asked you about your difficulty sleeping.  Do you remember I asked you that a
2 3	things, no. Feeling down, depressed or hopeless, no.  Do you see that?	2	Q If you recall earlier, I asked you about your difficulty sleeping.
2 3 4	things, no. Feeling down, depressed or hopeless, no.  Do you see that?  A Yes.  Q And that's a true and accurate	2 3 4	Q If you recall earlier, I asked you about your difficulty sleeping.  Do you remember I asked you that a question about that?  A Yes.
2 3 4 5	things, no. Feeling down, depressed or hopeless, no.  Do you see that?  A Yes.	2 3 4 5	Q If you recall earlier, I asked you about your difficulty sleeping.  Do you remember I asked you that a question about that?  A Yes.  Q So does the statement here from
2 3 4 5 6	things, no. Feeling down, depressed or hopeless, no.  Do you see that?  A Yes.  Q And that's a true and accurate statement of your well-being in November of 2017?  A Yes.	2 3 4 5 6	Q If you recall earlier, I asked you about your difficulty sleeping.  Do you remember I asked you that a question about that?  A Yes. Q So does the statement here from November 2017, I've been so unhappy that I've had
2 3 4 5 6 7	things, no. Feeling down, depressed or hopeless, no.  Do you see that?  A Yes.  Q And that's a true and accurate statement of your well-being in November of 2017?  A Yes.  Q And again if you go down to postpartum	2 3 4 5 6 7	Q If you recall earlier, I asked you about your difficulty sleeping.  Do you remember I asked you that a question about that?  A Yes.  Q So does the statement here from November 2017, I've been so unhappy that I've had difficulty sleeping, 0, no, not at all. Does that
2 3 4 5 6 7 8	things, no. Feeling down, depressed or hopeless, no.  Do you see that?  A Yes.  Q And that's a true and accurate statement of your well-being in November of 2017?  A Yes.  Q And again if you go down to postpartum visit, so it's underlined, I'm going to skip the	2 3 4 5 6 7 8	Q If you recall earlier, I asked you about your difficulty sleeping.  Do you remember I asked you that a question about that?  A Yes.  Q So does the statement here from November 2017, I've been so unhappy that I've had difficulty sleeping, 0, no, not at all. Does that refresh your recollection about when any sleep
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BY MR. KLAYMAN:   2		Page 101		Page 103
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Marked for identification and attached to the transcript.   13   Health Care medical record; right?   14   A   Yes.   15   Q   And this time the date is April 18th,   16   Q   So the court reporter has just handed   17   You a document that is marked Riggins Exhibit 9.   18   Have you seen this document before?   18   Have you seen this document before?   19   You can flip through it to see if   19   You who we will to the progress note, it says,   10   You know who that is?   10   You know who that is?   10   You know that is?   11   Said?   12   Yes a doctor at Unity Health Care   10   Yes a doctor a	10	A I believe it was I don't recall. I	10	
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22	20	it	20	Do you know who that is?
23	21	A (Witness reviews document.)	21	A Yes.
Okay. I'm not honestly sure.  Sorry. I don't recall seeing this.  Page 102  Page 104  Some of it looks familiar, but I can't Q Okay. Well, on the third page of the document, which has a a case caption, you'll see or, yeah, right there. Underneath Monique Russell, it says Jamine Riggins, 312 37th Street, Apartment Number Right?  A Yes. C Okay. And moving to the first, it Says, Reason for Appointment, I, Medical - adult EST patient, patient request birth control Est patient, patient request birth control C So this is the complaint that was filed A (Witness nods head.) C And that's vou's C And on the front page, do you see C And nowing down, excuse me, to under C Hield Pro Prothy, November 14, 2018. C Do you see that? C Do you see that refresh your recollection at C A Yes. C Do He's a doctor at Unity Health Care would with the ary you. C A Yeah. C Do you see did foctor, like, an OB or a general practitioner or you're not sure. C Do you see did I read that right? C A Yes. C And that's a true and accurate C Statement of the reasons why you went to Unity C Health Care in April of 2019? C And moving down, excuse me, to under C History of Present Illness, so the second underline is PHQ-2 where it says, PHQ-2, little C Interest or pleasure in doing things, no. Feeling C Down, depres	22	· · · · · · · · · · · · · · · · · · ·	22	Q And who is that?
Page 102  Page 102  Page 102  Page 104  Some of it looks familiar, but I can't  Q Okay. Well, on the third page of the  document, which has a a case caption, you'll  see or, yeah, right there.  Underneath Monique Russell, it says  Judieneath Monique Russell, it says  May Samine Riggins, 312 37th Street, Apartment Number  Riggins, 312 37th Street, Apartment Number  Riggins, 312 37th Street, Apartment Number  Right?  Right?  A Yes.  A I'm not sure.  Q Okay. And moving to the first, it  Says, Reason for Appointment, 1, Medical - adult  EST patient, patient request birth control  referral; 2, FP - birth control.  A Yes.  A Wes.  A Wes.  A Wes.  A Yes.  A Yes.  A Yes.  A Wes.  A Yes.  A Yes.  A Wes.  A Yes.  A Yes.  A Yes.  A Yes.  A Yes.  A Wes.  A Yes.  A Wes.  A We	23	(Witness continues reviewing document.)	23	A He's a doctor at Unity Health Care, but
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	Jasmine	K.	1991118
	Page 105		Page 107
1	A Yes.	1	A Yes.
2	Q Is that a true and accurate statement	2	Q about feeling depressed?
3	of your well-being in April 2019?	3	A Uh-huh. I don't recall the dates.
4	A Yes.	4	Q You don't recall the dates, you said?
5	Q Have you ever testified to feeling	5	A Yeah.
6	depressed?	6	Q Oh, okay.
7	A I'm sorry?	7	A Yeah.
8	Q Have you ever testified to feeling	8	Q Of the dates of what?
9	depressed?	9	A Of the question.
10	A I don't recall.	10	Q Oh, of when the when you answered
11	MR. KLAYMAN: Is this 11?	11	this question?
12	THE COURT REPORTER: Uh-huh.	12	A Yes.
13	(Riggins Deposition Exhibit 11 was	13	Q Okay. But you but you do recall
14	marked for identification and attached to the	14	having testified at your deposition
15	transcript.)	15	A Correct.
16	BY MR. KLAYMAN:	16	Q that you were feeling depressed?
17	Q So the court reporter has just handed	17	A Correct.
18	you what's been marked Russell uh, Riggins I	18	It's cold in here.
19	get them confused here Riggins Exhibit 11.	19	
20		20	Q So in April 2019, in Riggins
21	Do you recognize this document?	21	Exhibit 10, you told your medical professional
22	A (Witness reviews document.) Yes.	22	that you were not feeling depressed; right?
23	Yes.	23	A Yes.
	Q Yes?		Q But then at your deposition in the
24	And what is it?	24	Maryland litigation, you testified that you were
25	A Response to defendants' request for	25	feeling depressed?
	Page 106		Page 108
1	Page 106 admissions.	1	_
1 2	admissions.	1 2	A Correct. I was not feeling depressed
	admissions.  Q And you can see from the top of the		A Correct. I was not feeling depressed at that time of my visit.
2	admissions.  Q And you can see from the top of the first page it's in the Circuit Court for Prince	2	A Correct. I was not feeling depressed at that time of my visit.  Q At the time of your visit?
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	Jasmine		
	Page 109		Page 111
1	Health Care medical records that we went through;	1	them for a referral to somewhere that could treat
2	right?	2	your depression?
3	A Correct. They asked about that day.	3	A No.
4	Q Okay. So each time you you went,	4	Q Do you think they would be able to
5	you were answering about that day?	5	refer you to someone who could treat your your
6	A Correct.	6	feeling depressed?
7	Q And you never thought to tell them that	7	A I'm not honestly sure.
8	you were feeling depressed in between your visits?	8	MR. KLAYMAN: We've been going for a
9	A No.	9	little while, so why don't we take a quick break
10	Q During any of these time periods?	10	if that's all right.
11	A No.	11	THE WITNESS: Okay.
12	Q Why do you think your that Unity	12	THE VIDEOGRAPHER: Off the record at
13	Health Care was asking you these questions?	13	11:23.
14	A Because it's just something that they	14	(Recess 11:23 a m.)
15	want to know how you feel during that day at the	15	(After recess 11:35 a m.)
16	time of visit.	16	THE VIDEOGRAPHER: We are back on the
17	Q Do you think they would be interested	17	record at 11:35.
18	to in in terms of treating you, do you think	18	EXAMINATION BY COUNSEL FOR THE DEFENDANT
19	they would have wanted to know if you had been	19	BY MR. SHAFFER:
20	depressed in between visits?	20	Q Ms. Riggins, I want to ask you some
21	A I'm not honestly sure. I don't think	21	questions about the litigation that you initiated
22	there's something I didn't think that that was	22	in Maryland state court against Dimensions Health
23	something that they would consider, something that	23	Care, okay?
24	they would deal with. I would think that I would	24	A Okay.
25	go to another place for that.	25	Q When did you file that lawsuit?
	go to unotify place for unuti		•
		_	
	Page 110		Page 112
1	Q Another place?	1	MR. ZAJDEL: Objection: asked and
2	<ul><li>Q Another place?</li><li>A Yeah.</li></ul>	2	MR. ZAJDEL: Objection: asked and answered.
2 3	<ul><li>Q Another place?</li><li>A Yeah.</li><li>Q What do you mean?</li></ul>	2 3	MR. ZAJDEL: Objection: asked and answered. You can answer.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q Another place? A Yeah. Q What do you mean? A Like to see someone else versus this Unity Health Care. Q Where else would you have gone to seek treatment? A Other places that help, like a therapist or anybody else that has to do with emotional depression, things like that, how you feel. Q Do you know whether Unity Health Care has therapists on staff? A I do no, not really. Q Did you ever ask? A No. Q Why not? A It just didn't seem like that type of place. Q Did you ever ask them for a referral to a to a a place that would be more equipped in your estimation to treat your feeling your	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. ZAJDEL: Objection: asked and answered. You can answer. MR. SHAFFER: When? This morning? MR. ZAJDEL: (Indicating affirmatively.) BY MR. SHAFFER: Q Okay. So you told my colleague that it was in September of 2017; is that correct? A Correct. Q Okay. And why did you file that lawsuit? A I'm sorry. Q That's okay. My question was why you filed the lawsuit. Was was the reason you filed the lawsuit because you believed that Dimensions Health Care was responsible for your emotional injuries related to your interactions with Dr. Akoda? A Correct. Q Okay. And you're one of the named
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q Another place? A Yeah. Q What do you mean? A Like to see someone else versus this Unity Health Care. Q Where else would you have gone to seek treatment? A Other places that help, like a therapist or anybody else that has to do with emotional depression, things like that, how you feel. Q Do you know whether Unity Health Care has therapists on staff? A I do no, not really. Q Did you ever ask? A No. Q Why not? A It just didn't seem like that type of place. Q Did you ever ask them for a referral to a to a a place that would be more equipped	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. ZAJDEL: Objection: asked and answered. You can answer. MR. SHAFFER: When? This morning? MR. ZAJDEL: (Indicating affirmatively.) BY MR. SHAFFER: Q Okay. So you told my colleague that it was in September of 2017; is that correct? A Correct. Q Okay. And why did you file that lawsuit? A I'm sorry. Q That's okay. My question was why you filed the lawsuit. Was was the reason you filed the lawsuit because you believed that Dimensions Health Care was responsible for your emotional injuries related to your interactions with Dr. Akoda? A Correct.
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	Jasmine	R:	iggins
	Page 113		Page 115
1	active today?	1	page, which has the Bates number ending in 8683,
2	A Correct.	2	you'll see that it's a certificate of service
3	Q It is?	3	dated September 3rd, 2019, which was 13 days ago.
4	A I believe I'm sorry.	4	Have you ever seen this document
5	Q If you don't know, just	5	before?
6	A Yeah. I don't recall. I'm sorry.	6	A No.
7	Q Okay. Have you gotten any money from	7	Q Do you know what this document is?
8	Dimensions Health Care in connection with your	8	A A stipulation of dismissal without
9	lawsuit?	9	prejudice in the Circuit Court of Prince George's
10	A No.	10	County, Maryland.
11	Q Has anybody told you that you will be	11	Q What's your understanding of what
12	getting money from Dimensions Health Care?	12	this what this document does?
13	A No.	13	A Dismisses a case.
14	Q Okay. Did anybody tell you whether	14	Q Okay. Do you know whether this is the
15	they were going to dismiss your lawsuit against	15	lawsuit that you held you are a plaintiff in
16	Dimensions Health Care?	16	against Dimensions Health Care?
17	MR. ZAJDEL: Objection. That would be	17	A Yes.
18	attorney-client privilege.	18	Q It is?
19	BY MR. SHAFFER:	19	A Yes, I see my name.
20	Q Well, do you know whether your lawsuit	20	Q Okay. I think you have some exhibits
21	against Dimensions Health Care has been dismissed	21	in front of you. Do you want to look back at
22	or not?	22	Exhibit 7 that Mr. Klayman showed you this
23	A I don't recall.	23	morning?
24	Q Okay. So it might have been, but it	24	And if you take a look at the first
25	might not have been?	25	page of Riggins 7, there's a case number on the
	might not have been:		page of Riggins 7, there's a case number on the
	Page 114		Page 116
1	A Correct. It might have	1	right-hand side in the middle, handwritten,
2	Q Isn't that kind of a big deal, like if	2	CAL17-22761
3	you filed a lawsuit and then it got dismissed, you	3	A Uh-huh.
4	would know?	4	Q Do you see that?
5	A Correct.	5	A Yes.
6	Q But you as you sit here today, you	6	Q And then if you look at Riggins 12 and
7	don't know?	7	look at the top caption on the first page, it
8	A I don't recall, correct.	8	says, Monique Russell, et al., versus Dimensions
9	Q Okay.	9	Health Corp., et al., and the number is the same,
10	(Riggins Deposition Exhibit 12 was	10	CAL17-22761?
11	marked for identification and attached to the	11	A Correct.
12	transcript.)	12	Q Okay. Looking at Riggins 7 and
13	BY MR. SHAFFER:	13	Riggins 12, as you sit here today, do you have an
14	Q Ms. Riggins, I've handed you what's	14	understanding of whether your case against
15	been marked as Exhibit 12 in your deposition.	15	Dimensions Health Care in Maryland has been
16	It's a pleading in the Circuit Court for Prince	16	dismissed?
17	George's County, Maryland, entitled Stipulation of	17	A Yes.
18	Dismissal Without Prejudice.	18	Q It has; correct?
19	Take a look at that and let me know	19	A Correct.
20	when you're finished.	20	Q And how do you know that?
21	A (Witness reviews document.) Okay.	21	A From the information.
22	Q Okay. Have you had a chance to look at	22	Q What information?
23	that?	23	MR. ZAJDEL: Objection to the extent
24	A Yes.	24	you're asking questions about communications
		1	J 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
25	Q And if you flip over to the very last	25	between attorney-client.

	Jasmine	R:	
	Page 117		Page 119
1	BY MR. SHAFFER:	1	care was responsible for what you say are your
2	Q Well, here's what I'm trying to get at.	2	emotional injuries from Dr. Akoda, but yet you
3	I asked you a few moments ago if you knew whether	3	dismissed the case against them without getting
4	the case was dismissed or not, and you said you	4	any money; correct?
5	didn't remember.	5	A Correct.
6	We had that discussion	6	Q Why did you do that?
7	A Okay.	7	MR. ZAJDEL: Objection.
8	Q do you recall that?	8	To the extent he's asking for
9	A Yes.	9	communications between your attorneys and
10	Q Okay. And now I've showed you these	10	yourself.
11	two documents including a stipulation of dismissal	11	THE WITNESS: So what's the question?
12	from 13 days ago.	12	BY MR. SHAFFER:
13	My question is: Do you now recall that	13	Q I don't want to know about your
14	your case has been dismissed against Dimensions	14	communication with your lawyers. I'm just asking
15	Health Care?	15	you the question why did you agree to dismiss this
16	A Yes.	16	case.
17	Q And how long ago did you learn that	17	Well, let me let me back up. Did
18	your case against Dimensions Health Care had been	18	you agree to dismiss the case?
19	dismissed?	19	A Correct.
20	A My memory was refreshed today.	20	Q Why did you agree?
21	Q Okay. Did you know that your case	21	A Something I talked to my attorneys
22	against Dimensions Health Care had been dismissed	22	about.
23	before September 3rd?	23	Q Did you agree to dismiss the case
24	A Yes. I don't recall. I'm sorry. I	24	because statements you made in that litigation
25	don't recall.	25	against Dimensions Health were not true?
	Page 118		Page 120
1	Q Okay.	1	A No.
2	A I don't recall the dates.	2	Q Okay. You still believe everything you
3	Q But you are aware, as you sit here	3	said in that case is true and correct to the best
4	today, that sometime before today you were aware	4	of your ability; right?
5	that your case had been dismissed?	5	A Correct.
6	A Correct.	6	Q Let's take a look at at Riggins 7
7	Q Okay. And what are the terms on which	7	which is the class action complaint that was
8	you understand that dismissal occurred?	8	filed.
9	A I'm sorry?	9	A Okay.
10	Q Are you getting any money for	10	Q Actually, I'm going to give you an
11	dismissing the case?	11	amended complaint that you filed in that case,
12	A No.	12	just because that's the one I have marked up so it
13	Q Did you have to agree to pay any money	13	will be easier if we go through that one. I'm
14	to Dimensions Health Care as part of dismissing	14	going to mark it as exhibit Riggins 13 and give
15	that case?	15	you a copy.
16	A No.	16	(Riggins Deposition Exhibit 13 was
17	Q Did you have to agree whether the	17	marked for identification and attached to the
18	statute of limitations would or would not be	18	transcript.)
19		19	BY MR. SHAFFER:
20	impacted by your dismissal of the case?  A No.	20	
21		21	Q And, Ms. Riggins, looking at what has
	Q Did you have any discussions with		been marked as Exhibit 13, do you recognize that
22	anyone besides your lawyers about dismissing that	22	as the first amended class action complaint that
	case?	23	you filed in Prince George's County, Maryland,
	A No.	24	against Dimensions Health Corporation
24		2 =	A Vac
25	Q Okay. You believed Dimensions Health	25	A Yes.

	Jasmine	К.	1991119
	Page 121		Page 123
1	Q in December of 2017?	1	Dimensions knew or should have done to protect you
2	A Yes.	2	from Dr. Akoda; correct?
3	Q If we turn to page 3 of that document,	3	A Correct.
4	paragraph 14, just at the bottom.	4	Q And those are true and correct to the
5	A Okay.	5	best of your knowledge?
6	Q You state, Jasmine Riggins was a	6	A Correct.
7	patient of Oluwafemi Charles Igberase between	7	Q Okay. And in paragraph 81, you state
8	August 2012 and March 2013 at Dimensions, period.	8	that Dimensions' negligence was the sole and
9	Jasmine Riggins knew Oluwafemi Charles Igberase as	9	proximate cause of the injuries, damages, and
10	Akoda.	10	permanent disability of named plaintiffs and class
11	Is that true to the best of your	11	members with named plaintiffs and class members
12	knowledge?	12	being in no way contributorily negligent.
13	A Yes.	13	Again, that's your statement and true
14	Q Turn to page 11, and look at	14	and correct to the best of your knowledge?
15	paragraph 66 where you state, Between 2008 and	15	A Correct.
16	2016, Akoda was an actual and/or apparent, duly	16	Q Turning to page 16 of this document,
17	authorized agent, servant and/or employee of	17	you stated, Dimensions is liable and vicariously
18	Dimensions, holding a medical staff position	18	liable for Akoda's conduct.
19	and/or enjoying hospital privileges.	19	And you believe that to be true and
20	Is that true and correct to the best of	20	correct to the best of your knowledge?
21	your knowledge?	21	A Correct.
22	A Yes.	22	Q In paragraph 88 you say that
23	Q I'm sorry?	23	Dimensions' negligence was the sole and proximate
24	A Yes.	24	cause of the injuries, damages and permanent
25	Q Okay. Okay. Turn to the next page.	25	disability of named plaintiffs in the class, with
	Page 122		Page 124
1	Page 122 Actually, let's let's go back to paragraph 67	1	Page 124 named plaintiffs in the class being in no way
1 2	Actually, let's let's go back to paragraph 67	1 2	named plaintiffs in the class being in no way
	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions		
2	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient	2	named plaintiffs in the class being in no way contributorily negligent.  Correct?
2 3 4	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions	3	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer,
2 3 4	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who	3	named plaintiffs in the class being in no way contributorily negligent.  Correct?
2 3 4 5	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who received treatment from its agents, servants	2 3 4 5	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer, what paragraph was
2 3 4 5 6	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who received treatment from its agents, servants and/or employees, such as physicians who were	2 3 4 5 6	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer, what paragraph was  MR. SHAFFER: 88.
2 3 4 5 6 7	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who received treatment from its agents, servants and/or employees, such as physicians who were medical staff members and/or enjoyed hospital	2 3 4 5 6 7	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer, what paragraph was  MR. SHAFFER: 88.  MR. ZAJDEL: Okay. You can answer.
2 3 4 5 6 7 8	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who received treatment from its agents, servants and/or employees, such as physicians who were medical staff members and/or enjoyed hospital privileges, including specifically but not limited	2 3 4 5 6 7 8	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer, what paragraph was  MR. SHAFFER: 88.  MR. ZAJDEL: Okay. You can answer.  BY MR. SHAFFER:
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2 3 4 5 6 7 8 9	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who received treatment from its agents, servants and/or employees, such as physicians who were medical staff members and/or enjoyed hospital privileges, including specifically but not limited to Akoda.  Again, true and correct to the best of	2 3 4 5 6 7 8 9	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer, what paragraph was  MR. SHAFFER: 88.  MR. ZAJDEL: Okay. You can answer.  BY MR. SHAFFER:  Q I'm going to rephrase the question.  In paragraph 88 you wrote that
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2 3 4 5 6 7 8 9 10 11	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who received treatment from its agents, servants and/or employees, such as physicians who were medical staff members and/or enjoyed hospital privileges, including specifically but not limited to Akoda.  Again, true and correct to the best of your knowledge?  A Yes.	2 3 4 5 6 7 8 9 10 11 12	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer, what paragraph was  MR. SHAFFER: 88.  MR. ZAJDEL: Okay. You can answer.  BY MR. SHAFFER:  Q I'm going to rephrase the question.  In paragraph 88 you wrote that  Dimensions' negligence was the sole and proximate cause of the injuries, damages and permanent
2 3 4 5 6 7 8 9 10 11 12 13	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who received treatment from its agents, servants and/or employees, such as physicians who were medical staff members and/or enjoyed hospital privileges, including specifically but not limited to Akoda.  Again, true and correct to the best of your knowledge?  A Yes.  Q Okay. Paragraph 71 on the next page,	2 3 4 5 6 7 8 9 10 11 12 13	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer, what paragraph was  MR. SHAFFER: 88.  MR. ZAJDEL: Okay. You can answer.  BY MR. SHAFFER:  Q I'm going to rephrase the question.  In paragraph 88 you wrote that  Dimensions' negligence was the sole and proximate cause of the injuries, damages and permanent disability of named plaintiffs in the class, with
2 3 4 5 6 7 8 9 10 11 12 13 14	Actually, let's let's go back to paragraph 67 where you state, Between 2008 and 2016, Dimensions was responsible to assure and maintain patient safety and privacy for members of the public who received treatment from its agents, servants and/or employees, such as physicians who were medical staff members and/or enjoyed hospital privileges, including specifically but not limited to Akoda.  Again, true and correct to the best of your knowledge?  A Yes.  Q Okay. Paragraph 71 on the next page, you wrote, Dimensions knew or should have known,	2 3 4 5 6 7 8 9 10 11 12 13 14	named plaintiffs in the class being in no way contributorily negligent.  Correct?  MR. ZAJDEL: Okay. Before you answer, what paragraph was  MR. SHAFFER: 88.  MR. ZAJDEL: Okay. You can answer.  BY MR. SHAFFER:  Q I'm going to rephrase the question.  In paragraph 88 you wrote that  Dimensions' negligence was the sole and proximate cause of the injuries, damages and permanent disability of named plaintiffs in the class, with named plaintiffs in the class being in no way
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	Page 125		Page 127
1	matter of Monique Russell versus Dimensions Health	1	Q Okay. Were you aware of these
2	Corporation entitled Claimants' Certificate of	2	certifications and statements by Mr. Bojko before
3	Merit.	3	you dismissed your case against Dimensions Health
4	Take a quick look at this if you would.	4	Corporation?
5	A (Witness reviews document.)	5	A No.
6	Q Ms. Riggins, this document is entitled	6	Q Okay. Turn to the third page of
7	Claimants' Certificate of Merit, and the first	7	Exhibit 14, which is a letter dated February 26th,
8	page is a certificate by a gentleman named Thomas	8	2018, to a Paul Vettori.
9	Bojko.	9	Do you know Mr. Vettori?
10	Do you see that?	10	A Yes.
11	A Yes.	11	Q Who is he?
12	Q I'm sorry. Just try to keep your voice	12	A He's an attorney.
13	up.	13	Q Okay. Is he one of your attorneys in
14	A Yeah, it's a little cold in here. I'm	14	the lawsuit in Maryland and in Philadelphia?
15		15	A Yes.
	sorry. I'm just trying		
16	Q That's okay. We'll try to get it	16	Q Okay. This is a letter to him from
17	warmer.	17	Thomas Bojko, M.D., M.S., J.D., president and
18	Okay. Do you know who Mr. Bojko is?	18	managing partner of Aviva Healthcare Solutions.
19	A I do not.	19	And he writes to Mr. Vettori in the first
20	Q Okay. Do you see in the second	20	paragraph, This is to acknowledge that after a
21	paragraph that he says he has reviewed the	21	review of materials involved in the
22	captioned Class Action Amended Statement of Claim,	22	above-referenced case, I have concluded that there
23	a final decision and order of the Board of	23	have been violations of the applicable standards
24	Maryland Board of Physicians, Department of	24	of administrative care by Dimensions Health
25	Justice materials, proceedings of the criminal	25	Corporation d/b/a Prince George's Hospital Center,
	Justice materials, proceedings of the eriminal		Corporation d/b/a 1 timee George's Hospital Center,
	Page 126		T 150
	rage 120		Page 128
1	_	1	_
1 2	case against Dr. Charles Akoda/Igberase and other	1 2	individually and through their duly authorized
2	case against Dr. Charles Akoda/Igberase and other related materials regarding the above captioned	2	individually and through their duly authorized agents, apparent agents, servants and/or
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Page 129 Page 131 report any professional misconduct of which they 1 Α Correct. 2 should have known. Okay. And my question is, if you come 3 Do you agree with Mr. Bojko? to trial in this matter, will you agree that 4 Yes. because you don't have that information and 5 Okay. Next sentence he writes, As a anything your lawyers told you isn't something you 6 direct and proximate result of the defendants' know personally, that you're not going to come to continuing negligence, the claimants, and others trial and testify about things regarding ECFMG? similarly situated, suffered physical pain, MR. ZAJDEL: Objection. That's a 9 emotional anguish, and damages as well as personal decision that's going to be made by her attorneys, 10 disability. so I -- don't answer that question. I instruct 11 Do you agree with that? 11 the witness not to answer that question. 12 12 Yes. Α MR. SHAFFER: On what grounds? 13 13 Is that a yes? MR. ZAJDEL: You're asking her about a 14 Yes. 14 decision that's to be made between her and her 15 O Thank you. counsel. You're going to -- you -- you've 16 propounded discovery. I'm sure we've listed who And then he writes, Had the defendants 17 complied with the applicable standards of our witnesses are, or whatever the deadline date 18 administrative care the claimants, and others is for discovery closing we'll list who the 19 similarly situated, would not have suffered their witnesses are, and if her name is not there, she injuries, damages and permanent disability. 20 won't be testifying at trial. If her name is 21 21 Do you agree with that? there, she'll be testifying at trial. 22 MR. ZAJDEL: Objection: calls for a 22 MR. SHAFFER: And my question was a 23 23 legal conclusion. little -- it was a little more specific. 24 You can answer. 24 BY MR. SHAFFER: 25 25 THE WITNESS: Yes. I understand you may come testify at Page 130 Page 132 BY MR. SHAFFER: 1 trial. What I don't want to have happen is 1 2 there's a situation where you come and you've Okay. Do you know who hired Dr. Akoda 3 to work at Prince George's? looked at a whole bunch of documents and materials No. that you didn't look at before you came in here 5 Q I just want to ask a question to make 5 today. sure that we're on the same page. When we talked MR. SHAFFER: So that's my question. 7 on Thursday, I think you told me that you did not If the answer is the same, we'll take it up at the have any information about ECFMG except what you 8 appropriate time. 9 9 may have been told by your lawyers; correct? MR. ZAJDEL: Well, I'm still going to A Correct. 10 10 object to that question because I can't confirm or 11 Okay. And is it fair for me to then deny what Ms. Riggins will see or not see before assume that if this matter were to go to a trial, 12 12 the trial in preparing for a trial. 13 that you would not come to trial and expect to But if what you're trying to find out 14 testify about ECFMG; is that fair? is is she going to testify to her personal 15 Could you repeat your question? I'm knowledge about ECFMG differently than what she Α 16 testified to today, then I -- I believe that sorry. 17 answer is not going to change. Her knowledge as Q Sure. 18 18 You don't know anything about ECFMG of today was her knowledge as of today. 19 19 today other than what your lawyers told you; MR. SHAFFER: Right. right? 20 20 BY MR. SHAFFER: 21 Α 21 Q Again, in the interest of trying to Correct. 22 You don't have any firsthand knowledge, move this along, take a look at Riggins 11 which firsthand interactions, never spoke to anybody at 23 has already been marked this morning. ECFMG, never went to their Web site, never looked 24 And these are Plaintiff Jasmine Riggins at any of their materials; correct? Responses to Defendants' Requests for Admissions

Page 133 Page 135 1 that you served on the defendants in the 1 was something you were not aware of prior to Dimensions Health Care Corporation case in Thursday; correct? Correct. Maryland, and I think Mr. Klayman asked you a A question or two about this? Prior to Thursday, what you had been 5 A told or assumed was that that scarring had Yes. 6 occurred during the second C-section because it And my question is in responding to was noted in your discussions with your third these requests for admissions, were you trying to be as truthful and as accurate as you could be in doctor; correct? 9 9 answering the questions that were asked? A Correct. 10 10 A Okay. I think you also mentioned Yes. 11 Q And as you sit here today, do you briefly on Thursday that following the birth of believe that the answers that you gave in response Messiah -- and it was a good birth; right? He was to these requests for admissions back in the born healthy; correct? 14 Dimensions Health Care case are still true and Α Correct. 15 accurate to the best of your ability? Q -- that you have had some pain 16 Α resulting after the birth; is that correct? Yes. 17 17 You don't want to change any of these Correct. 18 18 answers today based on the dismissal of the What -- what exactly were you Q Dimensions Health Care case; right? 19 describing there? What was the condition that you 20 20 were describing? Α No. 21 21 The abdominal pains in my stomach. O Okay. 22 MR. SHAFFER: Let's go off the record 22 And do you think that that was the 23 for a minute. 23 result of having had the C-section? 24 THE VIDEOGRAPHER: Off the record at Α Yes. 25 25 12:06. Okay. And have you had pain following Page 134 Page 136 (Recess -- 12:06 p.m.) 1 each of the C-sections that you've had in your 2 (After recess -- 12:14 p m.) abdominal area? 3 THE VIDEOGRAPHER: We are back on the No, not as bad, no. record at 12:14. Okay. It might not have been as bad, 5 BY MR. SHAFFER: but is it fair to say that C-section is a major 6 Q Ms. Riggins, we're almost done here. I surgery in your abdominal area? A Correct, but I was --7 have a few more questions for you. I want to make sure I cover a couple of things that we started to Q Okay. Did you have abdominal pain 9 talk about on Thursday and didn't get to finish. after the first C-section? 10 10 I think we talked a little bit about Slight. 11 the different doctors that you have seen in 11 And if you were experiencing pain as a result of the C-section, that's something that you connection with your three children. There were three different doctors that you saw, one for each would have reported to your doctors; correct? I'm sorry? birth: correct? 14 Α 15 15 A Correct. Q If you were experiencing pain --16 abdominal pain following the C-sections, that's Q And you had a C-section in connection 17 with each of them; correct? 17 something you would have reported to your doctors? 18 18 Α Correct. 19 19 And I think we saw in the medical Q Okay. I saw somewhere in -- in the record that was prepared after your C-section documents we've received reference to Charter involving Messiah reporting the existence of 21 Health Clinic. significant scarring at that time. 22 Do you know who that is? Do you recall that? 23 23 A Yes. 24 A Correct. 24 Who is that? 0 25 25 And I think we talked about how that It's the office -- doctor's office I

	Jasmine	K.	iggins
	Page 137		Page 139
1	used to go to.	1	multiple names?
2	Q Okay. When did you go there?	2	A I'm sorry?
3	A Years ago.	3	Q Are you aware of whether or not ECFMG
4	Q Okay. What kind of doctor's office?	4	actually identified situations where Dr. Akoda had
5	A The same as Unity. It was actually	5	used different names?
6	Charter before it was Unity.	6	A Could you rephrase your question? I'm
7	Q Okay. So it was your general	7	sorry.
8	practitioner physician?	8	MR. SHAFFER: Can you read it back?
9	A Correct.	9	(The Record was read as requested.)
10	Q Okay. For what reasons would you go to	10	THE WITNESS: I'm not aware.
11	Charter Health Clinic?	11	MR. ZAJDEL: I'm sorry. I didn't hear
12	A Regular checkups, if I was feeling ill.	12	that.
13	Q When was the last time you were there?	13	MR. SHAFFER: She said, I think, I'm
14	A I don't recall.	14	
15	Q Do you know whether they still have any	15	not aware.
		16	THE WITNESS: I no. Sorry.
16  17	medical records from you?  A I do not know that.	17	MR. ZAJDEL: Can are you answering
			the question no, you're not aware? I want to make
18	Q Okay. And I apologize. I know you	18	sure
19	went over this, I think, with Mr. Klayman. But	19	MR. SHAFFER: Yeah.
20	when we talked on Thursday, you had mentioned some	20	MR. ZAJDEL: I understand. I'm not
21	communications with Monique Russell a month or so	21	trying to be in the way.
22	ago, and we talked about and made a request at the	22	THE WITNESS: Right.
23	deposition that you bring those with you today.	23	So you're asking if I'm aware I'm
24	And you have not done that; correct?	24	sorry.
25	A Correct.	25	MR. SHAFFER: That's all right.
	Page 138		Page 140
1	Q And you have not looked for those;	1	Let's
2	correct?	2	THE WITNESS: I'm
3	A Correct.	3	MR. SHAFFER: try
4	Q Why not?	4	THE WITNESS: having
5	A I've had other things going on,	5	MR. SHAFFER: again.
6	unfortunately.	6	THE WITNESS: a hard time
7	Q Is that something that you are still	7	comprehending this question.
8	willing to collect and provide to your attorneys	8	MR. ZAJDEL: So you haven't answered
9	to provide to us?	9	the question yet?
10	A Yes.	10	THE WITNESS: No.
11	Q Okay. And just so I'm clear, the	11	MR. ZAJDEL: Okay. I didn't know if
12	things that you think Dr. Akoda did that were	12	she was answering your question or.
13	wrong are what?	13	MR. SHAFFER: I'm not sure either. So
14	A Performing on women, doing C-sections,	14	we're going to have
15	looking at women's private parts, violating them,	15	
16		16	THE WITNESS: Sorry.  MP SHAFFER: the court reporter
17	touching them, not being honest with them.	17	MR. SHAFFER: the court reporter
	Q And what is it that you think ECFMG		that's okay. We're going to have the court
18	should have done?	18	reporter read it back and see if see if we can
19	A Paid attention to his credentials and	19	get there.
20	actually paid attention to him being interviewed	20	(The Record was read as requested.)
21	under two different names. Just be more careful	21	THE WITNESS: No. I'm sorry. I'm
22	about their job, pretty much. Be more careful	22	having a hard time comprehending that question.
23	about who they certify.	23	BY MR. SHAFFER:
24	Q And do you know whether or not they	24	Q Well, let me let me ask it again
25	identified instances where Dr. Akoda had used	25	because I don't want there to be any confusion
Į.		1	

_	Jasmine		1991115
	Page 141		Page 143
1	about it.	1	(Signature having not been waived, the
2	You said ECFMG should be more careful;	2	Videotaped Deposition of JASMINE RIGGINS ended at
3	right?	3	12:26 p.m.)
4	A Uh-huh.	4	
5	Q Those were your words?	5	
6	A Yes.	6	
7	Q All right. And my question, you said	7	
8	sort of strike that.	8	
9	And I guess my question was, do you	9	
10	know or would it make a difference in your mind if	10	
11	you were to learn that ECFMG actually did find	11	
12	situations where Dr. Akoda had tried to use	12	
13	different names?	13	
14	A Would it make a difference in my mind?	14	
15	I'm sorry.	15	
16	Q You don't know?	16	
17	A No.	17	
18	Q Would it make a difference in your mind	18	
19	if you were to learn that ECFMG had cooperated	19	
20	with the U.S. Attorney's Office and helped them	20	
21	build a case against Dr. Akoda?	21	
22	A Possibly, you know.	22	
23	Q Okay. And tell me again what you think	23	
24	Dimensions Health Care should have done to prevent	24	
25	Dr. Akoda from seeing you?	25	
	Page 142		Page 144
1	MR. ZAJDEL: Objection: asked and	1	CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC
2	answered.	2	I, Dana C. Ryan, Registered Professional
3	You can answer.	3	Reporter, Certified Realtime Reporter, the officer
4	THE WITNESS: Okay. Just be more	4	before whom the foregoing proceedings were taken
5	careful about who they allow to practice in their	5	do hereby certify that the foregoing transcript is
6	offices, hospitals; pay more attention; be more	6	a true and correct record to the best of my
7	take more pride in what they do, you know what I	7	ability of the proceedings; that said proceedings
8	mean, like just being on top being more	8	were taken by me stenographically and thereafter
9	careful.	9	reduced to typewriting under my supervision; and
10	MR. SHAFFER: Okay. I don't I don't	10	that I am neither counsel for, related to, nor
11	have any more questions at this time. We reserve	11	employed by any of the parties to this case and
12	the right to to requestion Ms. Riggins in light	12	have no interest, financial or otherwise, in its
13	of additional documents that might be produced or	13	outcome.
14	a change in her position regarding the information	14	IN WITNESS WHEREOF, I have hereunto set
15	that she has not been able to speak to from	15	my hand and affixed my notarial seal this 26th day
16	personal knowledge here today, whether regarding	16	of September 2019.
17	ECFMG or something else.	17	My Commission expires:
18	But subject to those comments, we'll	18	July 15, 2020
19	adjourn the deposition.	19	
20	MR. ZAJDEL: Okay. I don't have any	20	
21	questions.	21	
22	THE VIDEOGRAPHER: If that is	22	
23	everything, we are off the record on	23	NOTARY PUBLIC IN AND FOR THE
24	September 16th, 2019, at 12:26.	24	DISTRICT OF COLUMBIA
25		25	
1			

## Case 2:18-cv-05629-JDW Document 32-37 Filed 10/07/19 Page 40 of 40 Jasmine Riggins

	Page 145	
1	ACKNOWLEDGMENT OF DEPONENT	
2	I, Jasmine Riggins, do hereby	
3	acknowledge that I have read and examined the	
4	foregoing testimony, and the same is a true,	
5	correct and complete transcription of the	
6	testimony given by me and any corrections appear	
7	on the attached Errata sheet signed by me.	
8	on the attached Errata sheet signed by life.	
9		
10		
11	(DATE) (SIGNATURE)	
12	(DATE) (SIGNATURE)	
13		
14		
15	CERTIFICATE OF NOTARY PUBLIC	
16	Sworn and subscribed to before me this	
17	day of,	
18		
19		
20	<u> </u>	
21	NOTARY PUBLIC MY COMMISSION EXPIRES	
22		
23		
24		
25		